



# **Federal Aviation Administration History and Application of Section 508**

**Participant Guide**

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# **FAA History and Application of Section 508 Participant Guide**

## **Introduction**

### **Overview of Participant Guide**

The Participant Guide provides the specific documents and resource information presented during the History and Application of Section 508 training. Copies of the Power Point slides utilized during the training are included along with FAA documents and information relating to the specific roles and responsibilities of FAA Section 508 Coordinator, 508 Coordinators, Points of Contact and Agency-Wide Teams and the LOB Plan of Action. Spaces for notes are provided with the slides.

The instructor will direct you through the power point slides and the resource material provided in the participants' guide.

## **Elements of the Guide**

The participants guide includes:

- History and Application of Section 508 Power Point Presentation
- Participants Notes
- FAA Related Documents
- Section 508 Resource Information and Materials

# **History and Application of Section 508 Participant Guide**

## **Welcome to the FAA History and Application of Section 508 Training**

- Each participant should have signed the registration list and received a name tag.
- The FAA History and Application of Section 508 training will focus on the Section 508 requirements and standards.
- This training will present and describe FAA Section 508 policies and support in implementing Section 508 standards.
- This training will present the role and responsibilities of the FAA Section 508 Coordinator and the established Agency-Wide Teams and 508 Coordinators and Points of Contact to ensure the effective implementation of the Section 508 standards and requirements. Each of these team members and their roles and responsibilities will be presented.
- This training will also highlight the 508 Plan of Action and self-assessment questions for implementing Section 508 requirements and FAA policies and procedures.

## **The History and Application of Section 508 training will present:**

1. The Section 508 Standards and Requirements
2. FAA Section 508 Policies and Procedures
3. FAA Section 508 Coordinator Role and Responsibilities
4. FAA Section 508 Agency-Wide Teams
5. The FAA Plan of Action and Self-Assessment Questions to ensure the implementation of Section 508

When you're finished with this training module, you should understand:

- The Legislative History of section 508
- The Section 508 Requirements (Subpart A, B, C and D)
- The Access Board Technical Standards
- The application and implementation of Section 508 within FAA agencies
- The Section 508 Coordinator Role and Responsibilities
- The Roles and Responsibilities of the 508 Points of Contact
- The FAA Plan of Action and Self-Assessment Questions
- Section 508 Resources available within FAA and other Federal sources

The information provided in this History and Application of Section 508 training has been divided into the following 3 parts:

- Part 1: History and Application of Section 508 of the Rehabilitation Act of 1973, as amended in 1998
- Part 2: Role and Responsibilities of the Section 508 Agency-Wide Teams
- Part 3: FAA Section 508 Plan of Action

## **Part 1: History and Application of Section 508 of the Rehabilitation Act of 1973, as amended in 1998**

This section of the training outlines in detail the History and Application of the Section 508 requirements and standards that apply to FAA and other Federal agencies. The specific requirements and standards that will be addressed are:

- Section 508 Legislative History
- Section 508 Requirements (Part A)
- Section 508 Technical Standards (Part B)
- Functional Performance Criteria (Part C)
- Alternative Formats or Methods of Communication (Part D)
- Procurement, Maintenance Development or Use of Electronic Information Technology
- Undue Burden Documentation and Alternative Means of Access
- Non Availability Documentation
- Equivalent Facilitation
- Common Methods of Market Research
- Desktop Computing and Technical Support Services
- Section 508 Complaint Procedures

FAA has created a **Section 508 Resources Intranet web page** on the FAA Section 508 Intranet Web Site (<http://intranet.faa.gov/aio.508>). The Section 508 resources page has been included as a reference tool.

**The Scope of Section 508 and An Overview of the Section 508 Standards** are included in the participants guide to provide a summary of the Section 508 requirements and technical standards.

FAA has created an **Access Board Links** page on the FAA Section 508 Intranet site which provides the links of the Section 508 Standards and Summaries of the Technical Standards

The **Section 508 Resources** Section of the Participants Guide provides the Final Access Board standards and summaries of the technical standards (Part B).

Visit the [FAA Section 508 Intranet Web Site](http://intranet.faa.gov/AIO/508) for more information on FAA polices and procedures for implementing Section 508 <http://intranet.faa.gov/AIO/508>

## **FAA Section 508 Resources**

### **Strategies for Section 508 Compliance**

The enforcement of Section 508 became effective on June 21, 2001. FAA is striving to develop crosscutting agency-wide policies and procedures to implement and institutionalize the Section 508 requirements. Best practices will be posted to our site. These best practices will provide FAA employees, managers, and customers with creative and innovative strategies that are being undertaken and should be considered to comply with the Section 508 requirements.

### **FAA Web Accessibility Guidelines for Section 508**

The Web Accessibility Guidelines for Section 508 are code examples and techniques for making a web page compliant to Section 508.

### **FAQs about Web Accessibility and Section 508** (updated Feb. 28, 2002)

Frequently Asked Questions about PDF files, Web Accessibility, JAVA, Multimedia, Software Applications, Computers, JAWS, Coldfusion, and Section 508 implementation.

### **FAA Web Accessibility Checklist for Section 508**

The Web Accessibility Checklist for Section 508 is 36 questions, broken down into sections, to check a web page for compliance to Section 508.

### **Section 508 Short Guide** (updated Feb. 28, 2002)

A quick solution guide to common Section 508 issues.

### **Online Training** (updated Feb. 28, 2002)

Training guides for managers and webmasters

### **Do you have a Section 508 Question?**

Do you have a question about web pages and Section 508? Send in you question and receive an answer back and help add to the FAA Section508 FAQ database. Your question can be on any topic about Section 508, including software, hardware, multimedia, and web. It you have a procurement questions, please go to the Section 508 Procurement Section.

### **Need a Section 508 Review?**

Register your web site and we will review your site for Section 508 compliance.

### **Free tools for checking Section 508 compliancy**

Free tools that can be downloaded or use on the Internet for checking Section 508.

### **Non-Compliant Page Example**

A visual representation of a non-complaint page.

**Access Board Links**

Direct links to the Access Board's EIT Accessibility Standards and technical guides. Summaries for the six areas of the EIT Accessibility Standards for Web, Software, Telecommunications, Self-contained products, computers, and Multi-media.

**Introduction to Screen Readers**

This is a 7-minute QuickTime file about screen readers. You will need to download QuickTime 5 player from Apple's web site.

**JAWS Keystrokes and Functions**

A listing, in table format of JAWS keystrokes and related functions. The listings are for general Windows navigation, IE 5.x, MS-Word, and MS-Excel.

**Assistive Technology Devices at the Disability Resource Center**

A listing of assistive technology devices at the DOT Disability Resource Center.

**Alternate Format Vendors**

A listing of vendors that supply alternative formats for documents.

**Caption Vendors**

A listing of vendors that provide captioning.

**PageScreamer Tips, Issues, Bugs, and Work Arounds (under development)**

Information about PageScreamer's bugs, how-tos, work arounds, and issues.

**Section 508: Scope Backup dated: June 21, 2001**

- **Purpose**
- **Application**
- **General Exceptions**
- **Definitions**
- **Equivalent Facilitation**

**Purpose**

The purpose of this technical assistance document is to ensure successful implementation of section 508 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794d). Section 508 requires that when Federal agencies develop, procure, maintain, or use electronic and information technology, Federal employees with disabilities have access to and use of information and data that is comparable to the access and use by Federal employees who are not individuals with disabilities, unless an undue burden would be imposed on the agency. Section 508 also requires that individuals with disabilities, who are members of the public seeking information or services from a Federal agency, have access to and use of information and data that is comparable to that provided to the public who are not individuals with disabilities, unless an undue burden would be imposed on the agency.

Technical assistance materials are designed to allow individuals and organizations to understand how to design, develop, and procure electronic information technology (EIT) to meet the compliance requirements to ensure the accessible use of Federal EIT. In order to highlight and share information, the Access Board intends on adding information, examples, and resources to this online document. Furthermore, Frequently Asked Questions (FAQs), links to related Final Rule language, and training materials will be available as the document grows.

For more information on this project, please contact the Access Board.

**Application**

(a) Products covered by section 508 shall comply with all applicable provisions of these standards. When developing, procuring, maintaining, or using electronic and information technology, each agency shall ensure that the products comply with the applicable provisions of these standards, unless an undue burden would be imposed on the agency.

This section specifies what electronic and information technology is covered by the standards. For example, a computer and its software programs would be required to comply with §1194.26, Desktop and portable computers, §1194.21, Software applications and operating systems, and the functional performance criteria in §1194.31. Paragraph (a) states the general statutory requirement for electronic and information technology that must comply with the standards unless doing so would result in an undue burden. The term "undue burden" is defined at §1194.4 (Definitions).

(1) When compliance with the provisions of these standards imposes an undue burden, agencies shall provide individuals with disabilities with the information and data involved by an



alternative means of access that allows the individual to use the information and data.

For example, a Federal agency wishes to purchase a computer program that generates maps denoting regional demographics. If the agency determines that it would constitute an undue burden to purchase an accessible version of such a program, the agency would be required to make the information provided by the program available in an alternative means to users with disabilities. In addition, the requirements to make reasonable accommodations for the needs of an employee with a disability under section 501 and to provide overall program accessibility under section 504 of the Rehabilitation Act also apply.

(2) When procuring a product, if an agency determines that compliance with any provision of these standards imposes an undue burden, the documentation by the agency supporting the procurement shall explain why, and to what extent, compliance with each such provision creates an undue burden.

This documentation must explain in detail which provision or provisions of this rule impose an undue burden and the extent of such a burden. The agency should discuss each of the factors considered in its undue burden analysis.

(b) When procuring a product, each agency shall procure products, which comply with the provisions in these standards when such products are available in the commercial marketplace or when such products are developed in response to a Government solicitation. Agencies cannot claim a product, as a whole is not commercially available because no product in the marketplace meets all the standards. If products are commercially available that meet some but not all of the standards, the agency must procure the product that best meets the standards.

The concept of commercial availability is based on existing provisions in the FAR (see 48 CFR 2.101, Definitions of Words and Terms: Commercial item).

With respect to documentation, Federal agencies may choose to document a determination that a product is not available in the commercial marketplace in anticipation of a subsequent inquiry. However, such documentation is not required by section 508.

Similar to an undue burden analysis, agencies cannot claim that a product as a whole is not commercially available because no product in the marketplace meets all the standards. If products are commercially available that meet some but not all of the standards, the agency must procure the product that best meets the standards.

(c) Except as provided by §1194.3(b), these standards apply to electronic and information technology developed, procured, maintained, or used by agencies directly or used by a contractor under a contract with an agency which requires the use of such product, or requires the use, to a significant extent, of such product in the performance of a service or the furnishing of a product.

Consistent with section 5002(3)(C) of the Clinger-Cohen Act of 1996 (40 U.S.C. 1452) and as further discussed in section 1194.3(b) below, products used by a contractor which are incidental

to a contract are not covered by this rule. For example, a Federal agency enters into a contract to have a web site developed for the agency. The contractor uses its own office system to develop the web site. The web site is required to comply with this rule since the web site is the purpose of the contract. However, the contractor's office system does not have to comply with these standards, since the equipment used to produce the web site is incidental to the contract. See section 1194.3(b) below.

### **General Exceptions**

(a) These standards do not apply to any electronic and information technology operated by agencies, the function, operation, or use of which involves intelligence activities, cryptologic activities related to national security, command and control of military forces, equipment that is an integral part of a weapon or weapons system, or systems which are critical to the direct fulfillment of military or intelligence missions. Systems which are critical to the direct fulfillment of military or intelligence missions do not include a system that is to be used for routine administrative and business applications (including payroll, finance, logistics, and personnel management applications).

This section provides general exceptions from the standards. The exception in paragraph (a) is statutory under section 508 and is consistent with a similar exception in section 5142 of the Clinger-Cohen Act of 1996. This exception does not apply to a system that is to be used for routine administrative and business applications (including payroll, finance, logistics, and personnel management applications). For example, software used for payroll, word processing software used for production of routine documents, ordinary telephones, copiers, fax machines, and web applications must still comply with the standards even if they are developed, procured, maintained, or used by an agency engaged in intelligence or military activities. The Board understands that the Department of Defense interprets this to mean that a computer designed to provide early missile launch detection would not be subject to these standards, nor would administrative or business systems that must be architecturally tightly coupled with a mission-critical, national security system, to ensure interoperability and mission accomplishment.

(b) These standards do not apply to electronic and information technology that is acquired by a contractor incidental to a contract.

The products a contractor develops, procures, maintains, or uses which are not specified as part of a contract with a Federal agency are not required to comply with these standards. For example, a consulting firm that enters into a contract with a Federal agency to produce a report is not required to procure accessible computers and word processing software to produce the report regardless of whether those products were used exclusively for the government contract or used on both government and non-government related activities since the purpose of the contract was to procure a report. Similarly, if a firm is contracted to develop a web site for a Federal agency, the web site created must be fully compliant with these standards, but the firm's own web site would not be covered.

(c) Except as required to comply with the provisions in these standards, section 508 does not require the installation of specific accessibility-related software or the attachment of an assistive

technology device at a workstation of a Federal employee who is not an individual with a disability.

Specific accessibility related software means software that has the sole function of increasing accessibility for persons with disabilities to other software programs (e.g., screen magnification software). The purpose of section 508 and these standards is to build as much accessibility as is reasonably possible into general products developed, procured, maintained, or used by agencies. It is not expected that every computer will be equipped with a refreshable Braille display, or that every software program will have a built-in screen reader. Such assistive technology may be required as part of a reasonable accommodation for an employee with a disability or to provide program accessibility. To the extent that such technology is necessary, products covered by these standards must not interfere with the operation of the assistive technology.

(d) When agencies provide access to the public to information or data through electronic and information technology, agencies are not required to make products owned by the agency available for access and use by individuals with disabilities at a location other than that where the electronic and information technology is provided to the public, or to purchase products for access and use by individuals with disabilities at a location other than that where the electronic and information technology is provided to the public.

For example, if an agency provides an information kiosk in a Post Office, a means to access the kiosk information for a person with a disability need not be provided in any location other than at the kiosk itself.

(e) This part shall not be construed to require a fundamental alteration in the nature of a product or its components.

Fundamental alteration is an appropriate exception for inclusion in the standards. It means a change in the fundamental characteristic or purpose of the product or service, not merely a cosmetic or aesthetic change. For example, an agency intends to procure pocket-sized pagers for field agents for a law enforcement agency. Adding a large display to a small pager may fundamentally alter the device by significantly changing its size to such an extent that it no longer meets the purpose for which it was intended, that is to provide a communication device which fits in a shirt or jacket pocket. For some of these agents, portability of electronic equipment is a paramount concern. Generally, adding access should not change the basic purpose or characteristics of a product in a fundamental way.

(f) Products located in spaces frequented only by service personnel for maintenance, repair, or occasional monitoring of equipment are not required to comply with these standards.

In Paragraph (f), the Board has provided an exception that products located in spaces frequented only by service personnel for maintenance, repair, or occasional monitoring of equipment are not required to comply with these standards.

### **Definitions**

*Agency.* Any Federal department or agency, including the United States Postal Service.

*Alternate formats. Alternate formats usable by people with disabilities may include, but are not limited to, Braille, ASCII text, large print, recorded audio, and electronic formats that comply with this part.*

Certain product information is required to be made available in alternate formats to be usable by individuals with various disabilities.

*Alternate methods. Different means of providing information, including product documentation, to people with disabilities. Alternate methods may include, but are not limited to, voice, fax, relay service, TTY, Internet posting, captioning, text-to-speech synthesis, and audio description.*

*Assistive technology. Any item, piece of equipment, or system, whether acquired commercially, modified, or customized, that is commonly used to increase, maintain, or improve functional capabilities of individuals with disabilities. The definition was derived from the definition of assistive technology in the Assistive Technology Act of 1998 (29 U.S.C. 3002).*

*Electronic and information technology. Includes information technology and any equipment or interconnected system or subsystem of equipment, that is used in the creation, conversion, or duplication of data or information. The term electronic and information technology includes, but is not limited to, telecommunications products (such as telephones), information kiosks and transaction machines, World Wide Web sites, multimedia, and office equipment such as copiers and fax machines. The term does not include any equipment that contains embedded information technology that is used as an integral part of the product, but the principal function of which is not the acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. For example, HVAC (heating, ventilation, and air conditioning) equipment such as thermostats or temperature control devices, and medical equipment where information technology is integral to its operation, are not information technology.*

This is the statutory term for the products covered by the standards in this part. The term is consistent with the definition of information technology in the Clinger-Cohen Act of 1996.

Information technology includes computers, ancillary equipment, software, firmware and similar procedures, services (including support services), and related resources. Electronic and information technology includes information technology products like those listed above as well as telecommunications products (such as telephones), information kiosks and transaction machines, World Wide Web sites, multimedia, and office equipment such as copiers, and fax machines.

Consistent with the FAR, the Board proposed that electronic and information technology not include any equipment that contains embedded information technology that is used as an integral part of the product, but the principal function of which is not the acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. For example, HVAC (heating, ventilation, and air conditioning) equipment such as thermostats or temperature control devices, and medical equipment where information technology is integral to its operation, are not information technology.

*Information technology. Any equipment or interconnected system or subsystem of equipment, that is used in the automatic acquisition, storage, manipulation, management, movement,*

*control, display, switching, interchange, transmission, or reception of data or information. The term information technology includes computers, ancillary equipment, software, firmware and similar procedures, services (including support services), and related resources.*

The definition of information technology is identical to that in the Clinger-Cohen Act.

*Operable controls. A component of a product that requires physical contact for normal operation. Operable controls include, but are not limited to, mechanically operated controls, input and output trays, card slots, keyboards, or keypads.*

Examples of operable controls on/off switches, buttons, dials and knobs, mice, keypads and other input devices, copier paper trays (both input and output), coin and card slots, card readers, and similar components. Operable controls do not include voice-operated controls. This definition is intended to apply to products in their normal operation rather than when the product may be used for maintenance, repair, or occasional monitoring. For example, a user should be able to add paper to a desktop laser printer.

*Product. Electronic and information technology.*

*Self-Contained, Closed Products. Products that generally have embedded software and are commonly designed in such a fashion that a user cannot easily attach or install assistive technology. These products include, but are not limited to, information kiosks and information transaction machines, copiers, printers, calculators, fax machines, and other similar types of products.*

*Telecommunications. The transmission, between or among points specified by the user, of information of the user's choosing, without change in the form or content of the information as sent and received.*

The definition for telecommunications is consistent with the definition in the Board's Telecommunications Act Accessibility Guidelines and the definition of telecommunications in the Telecommunications Act.

*TTY. An abbreviation for teletypewriter. Machinery or equipment that employs interactive text based communications through the transmission of coded signals across the telephone network. TTYs may include, for example, devices known as TDDs (telecommunication display devices or telecommunication devices for deaf persons) or computers with special modems. TTYs are also called text telephones.*

The definition for the term TTY is consistent with the definition of TTY in the Board's ADA Accessibility Guidelines and Telecommunications Act Accessibility Guidelines.

*Undue burden. Undue burden means significant difficulty or expense. In determining whether an action would result in an undue burden, an agency shall consider all agency resources available to the program or component for which the product is being developed, procured, maintained, or used.*

The term "undue burden" is based on case law interpreting section 504 of the Rehabilitation Act (Southeastern Community College v. Davis, 442 U.S. 397 (1979)), and has been included in agency regulations issued under section 504 since the Davis case. See, e.g., 28 CFR 39.150. The term undue burden is also used in Title III of the ADA, 42 U.S.C. 12182 (b)(2)(A)(iii). The legislative history of the ADA states that the term undue burden is derived from section 504 and the regulations thereunder, and is analogous to the term "undue hardship" in Title I of the ADA, which Congress defined as "an action requiring significant difficulty or expense." 42 U.S.C. 12111(10)(A). See, H. Rept. 101-485, pt. 2, at 106.

Title I of the ADA lists factors to be considered in determining whether a particular action would result in an undue hardship. 42 U.S.C.12111(10)(B)(i)-(iv). However, since title I of the ADA addresses employment and the individual accommodation of employees, not all of the factors are directly applicable to section 508 except for the financial resources of the covered facility or entity which is necessary to a determination of "significant difficulty or expense." Unlike title I, section 508 requires that agencies must procure accessible electronic and information technology regardless of whether they have employees with disabilities. Requiring agencies to purchase accessible products at the outset eliminates the need for expensive retrofitting of an existing product when requested by an employee or member of the public as a reasonable accommodation at a later time.

The provision states that "agency resources available to a program or component" are to be considered in determining whether an action is an undue burden. Because available financial resources vary greatly from one agency to another, what constitutes an undue burden for a smaller agency may not be an undue burden for another, larger agency having more resources to commit to a particular procurement. Each procurement would necessarily be determined on a case-by-case basis. Because a determination of whether an action would constitute an undue burden is made on a case-by-case basis, it would be inappropriate for the Board to assess a set percentage for the increased cost of a product that would be considered an undue burden in every case.

### **Equivalent Facilitation**

Nothing in these standards is intended to prevent the use of designs or technologies as alternatives to those prescribed in this part provided they result in substantially equivalent or greater access to and use of a product for people with disabilities.

This provision is not a "waiver" or "variance" from the requirement to provide accessibility, but a recognition that future technologies may be developed, or existing technologies could be used in a particular way, that could provide the same functional access in ways not envisioned by these standards. In evaluating whether a technology results in "substantially equivalent or greater access," it is the functional outcome, not the form, which is important. For example, an information kiosk, which is not accessible to a person who is blind, might be made accessible by having a telephone handset that connects to a computer that responds to touch-tone commands and delivers the same information audibly. In addition, voice recognition and activation are progressing rapidly so that voice input soon may become a reasonable substitute for some or all keyboard input functions. For example, already some telephones can be dialed by voice. In effect, compliance with the performance criteria of §1194.31 is the test for Equivalent Facilitation.

## **Section 508 Standards**

- Subpart A -- General
  - 1194.1 Purpose.
  - 1194.2 Application.
  - 1194.3 General exceptions.
  - 1194.4 Definitions.
  - 1194.5 Equivalent facilitation.
- Subpart B -- Technical Standards
  - 1194.21 Software applications and operating systems.
  - 1194.22 Web-based intranet and internet information and applications. 16 rules.
  - 1194.23 Telecommunications products.
  - 1194.24 Video and multimedia products.
  - 1194.25 Self contained, closed products.
  - 1194.26 Desktop and portable computers.
- Subpart C -- Functional Performance Criteria
  - 1194.31 Functional performance criteria.
- Subpart D -- Information, Documentation, and Support
  - 1194.41 Information, documentation, and support.
- Figures to Part 1194

Authority: 29 U.S.C. 794d.

### **Subpart A -- General**

#### **§ 1194.1 Purpose.**

The purpose of this part is to implement section 508 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794d). Section 508 requires that when Federal agencies develop, procure, maintain, or use electronic and information technology, Federal employees with disabilities have access to and use of information and data that is comparable to the access and use by Federal employees who are not individuals with disabilities, unless an undue burden would be imposed on the agency. Section 508 also requires that individuals with disabilities, who are members of the public seeking information or services from a Federal agency, have access to and use of information and data that is comparable to that provided to the public who are not individuals with disabilities, unless an undue burden would be imposed on the agency.

#### **§ 1194.2 Application.**

(a) Products covered by this part shall comply with all applicable provisions of this part. When developing, procuring, maintaining, or using electronic and information technology, each agency shall ensure that the products comply with the applicable provisions of this part, unless an undue burden would be imposed on the agency.

(1) When compliance with the provisions of this part imposes an undue burden, agencies shall provide individuals with disabilities with the information and data involved by an alternative means of access that allows the individual to use the information and data.

(2) When procuring a product, if an agency determines that compliance with any provision of this part imposes an undue burden, the documentation by the agency supporting the procurement shall explain why, and to what extent, compliance with each such provision creates an undue burden.

(b) When procuring a product, each agency shall procure products which comply with the provisions in this part when such products are available in the commercial marketplace or when such products are developed in response to a Government solicitation. Agencies cannot claim a product, as a whole is not commercially available because no product in the marketplace meets all the standards. If products are commercially available that meet some but not all of the standards, the agency must procure the product that best meets the standards.

(c) Except as provided by §1194.3(b), this part applies to electronic and information technology developed, procured, maintained, or used by agencies directly or used by a contractor under a contract with an agency which requires the use of such product, or requires the use, to a significant extent, of such product in the performance of a service or the furnishing of a product.

**§ 1194.3 General exceptions.**

(a) This part does not apply to any electronic and information technology operated by agencies, the function, operation, or use of which involves intelligence activities, cryptologic activities related to national security, command and control of military forces, equipment that is an integral part of a weapon or weapons system, or systems which are critical to the direct fulfillment of military or intelligence missions. Systems which are critical to the direct fulfillment of military or intelligence missions do not include a system that is to be used for routine administrative and business applications (including payroll, finance, logistics, and personnel management applications).

(b) This part does not apply to electronic and information technology that is acquired by a contractor incidental to a contract.

(c) Except as required to comply with the provisions in this part, this part does not require the installation of specific accessibility-related software or the attachment of an assistive technology device at a workstation of a Federal employee who is not an individual with a disability.

(d) When agencies provide access to the public to information or data through electronic and information technology, agencies are not required to make products owned by the agency available for access and use by individuals with disabilities at a location other than that where the electronic and information technology is provided to the public, or to purchase products for access and use by individuals with disabilities at a location other than that where the electronic and information technology is provided to the public.

(e) This part shall not be construed to require a fundamental alteration in the nature of a product or its components.

(f) Products located in spaces frequented only by service personnel for maintenance, repair, or occasional monitoring of equipment are not required to comply with this part.

**§ 1194.4 Definitions.**

The following definitions apply to this part:

**Agency.** Any Federal department or agency, including the United States Postal Service.

**Alternate formats.** Alternate formats usable by people with disabilities may include, but are not limited to, Braille, ASCII text, large print, recorded audio, and electronic formats that comply with this part.

**Alternate methods.** Different means of providing information, including product documentation, to people with disabilities. Alternate methods may include, but are not limited to, voice, fax, relay service, TTY, Internet posting, captioning, text-to-speech synthesis, and audio description.



**Assistive technology.** Any item, piece of equipment, or system, whether acquired commercially, modified, or customized, that is commonly used to increase, maintain, or improve functional capabilities of individuals with disabilities.

**Electronic and information technology.** Includes information technology and any equipment or interconnected system or subsystem of equipment, that is used in the creation, conversion, or duplication of data or information. The term electronic and information technology includes, but is not limited to, telecommunications products (such as telephones), information kiosks and transaction machines, World Wide Web sites, multimedia, and office equipment such as copiers and fax machines. The term does not include any equipment that contains embedded information technology that is used as an integral part of the product, but the principal function of which is not the acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. For example, HVAC (heating, ventilation, and air conditioning) equipment such as thermostats or temperature control devices, and medical equipment where information technology is integral to its operation, are not information technology.

**Information technology.** Any equipment or interconnected system or subsystem of equipment, that is used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. The term information technology includes computers, ancillary equipment, software, firmware and similar procedures, services (including support services), and related resources.

**Operable controls.** A component of a product that requires physical contact for normal operation. Operable controls include, but are not limited to, mechanically operated controls, input and output trays, card slots, keyboards, or keypads.

**Product.** Electronic and information technology.

**Self-Contained, Closed Products.** Products that generally have embedded software and are commonly designed in such a fashion that a user cannot easily attach or install assistive technology. These products include, but are not limited to, information kiosks and information transaction machines, copiers, printers, calculators, fax machines, and other similar types of products.

**Telecommunications.** The transmission, between or among points specified by the user, of information of the user's choosing, without change in the form or content of the information as sent and received.

**TTY.** An abbreviation for teletypewriter. Machinery or equipment that employs interactive text based communications through the transmission of coded signals across the telephone network. TTYs may include, for example, devices known as TDDs (telecommunication display devices or telecommunication devices for deaf persons) or computers with special modems. TTYs are also called text telephones.

**Undue burden.** Undue burden means significant difficulty or expense. In determining whether an action would result in an undue burden, an agency shall consider all agency resources available to the program or component for which the product is being developed, procured, maintained, or used.

#### **§ 1194.5 Equivalent facilitation.**

Nothing in this part is intended to prevent the use of designs or technologies as alternatives to those prescribed in this part provided they result in substantially equivalent or greater access to and use of a product for people with disabilities.

**Subpart B -- Technical Standards**

**§ 1194.21 Software applications and operating systems.**

- (a) When software is designed to run on a system that has a keyboard, product functions shall be executable from a keyboard where the function itself or the result of performing a function can be discerned textually.
- (b) Applications shall not disrupt or disable activated features of other products that are identified as accessibility features, where those features are developed and documented according to industry standards. Applications also shall not disrupt or disable activated features of any operating system that are identified as accessibility features where the application programming interface for those accessibility features has been documented by the manufacturer of the operating system and is available to the product developer.
- (c) A well-defined on-screen indication of the current focus shall be provided that moves among interactive interface elements as the input focus changes. The focus shall be programmatically exposed so that assistive technology can track focus and focus changes.
- (d) Sufficient information about a user interface element including the identity, operation and state of the element shall be available to assistive technology. When an image represents a program element, the information conveyed by the image must also be available in text.
- (e) When bitmap images are used to identify controls, status indicators, or other programmatic elements, the meaning assigned to those images shall be consistent throughout an application's performance.
- (f) Textual information shall be provided through operating system functions for displaying text. The minimum information that shall be made available is text content, text input caret location, and text attributes.
- (g) Applications shall not override user selected contrast and color selections and other individual display attributes.
- (h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.
- (i) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.
- (j) When a product permits a user to adjust color and contrast settings, a variety of color selections capable of producing a range of contrast levels shall be provided.
- (k) Software shall not use flashing or blinking text, objects, or other elements having a flash or blink frequency greater than 2 Hz and lower than 55 Hz.
- (l) When electronic forms are used, the form shall allow people using assistive technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.

**§ 1194.22 Web-based intranet and internet information and applications.**

- (a) A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).
- (b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.
- (c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.
- (d) Documents shall be organized so they are readable without requiring an associated style sheet.
- (e) Redundant text links shall be provided for each active region of a server-side image map.

- (f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape.
- (g) Row and column headers shall be identified for data tables.
- (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers.
- (i) Frames shall be titled with text that facilitates frame identification and navigation.
- (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.
- (k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.
- (l) When pages utilize scripting languages to display content, or to create interface elements, the information provided by the script shall be identified with functional text that can be read by assistive technology.
- (m) When a web page requires that an applet, plug-in or other application be present on the client system to interpret page content, the page must provide a link to a plug-in or applet that complies with §1194.21(a) through (l).
- (n) When electronic forms are designed to be completed on-line, the form shall allow people using assistive technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.
- (o) A method shall be provided that permits users to skip repetitive navigation links.
- (p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.

**Note to §1194.22:**

1. The Board interprets paragraphs (a) through (k) of this section as consistent with the following priority 1 Checkpoints of the Web Content Accessibility Guidelines 1.0 (WCAG 1.0) (May 5, 1999) published by the Web Accessibility Initiative of the World Wide Web Consortium:

Section 1194.22 Paragraph	WCAG 1.0 Checkpoint
(a)	1.1
(b)	1.4
(c)	2.1
(d)	6.1
(e)	1.2
(f)	9.1
(g)	5.1
(h)	5.2
(i)	12.1
(j)	7.1
(k)	11.4

2. Paragraphs (l), (m), (n), (o), and (p) of this section are different from WCAG 1.0. Web pages that conform to WCAG 1.0, level A (i.e., all priority 1 checkpoints) must also meet paragraphs (l), (m), (n), (o), and (p) of this section to comply with this section. WCAG 1.0 is available at <http://www.w3.org/TR/1999/WAI-WEBCONTENT-19990505>.

**§ 1194.23 Telecommunications products.**

- (a) Telecommunications products or systems which provide a function allowing voice communication and which do not themselves provide a TTY functionality shall provide a standard non-acoustic connection point for TTYs. Microphones shall be capable of being turned on and off to allow the user to intermix speech with TTY use.
- (b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.
- (c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.
- (d) Voice mail, messaging, auto-attendant, and interactive voice response telecommunications systems that require a response from a user within a time interval, shall give an alert when the time interval is about to run out, and shall provide sufficient time for the user to indicate more time is required.
- (e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.
- (f) For transmitted voice signals, telecommunications products shall provide a gain adjustable up to a minimum of 20 dB. For incremental volume control, at least one intermediate step of 12 dB of gain shall be provided.
- (g) If the telecommunications product allows a user to adjust the receive volume, a function shall be provided to automatically reset the volume to the default level after every use.
- (h) Where a telecommunications product delivers output by an audio transducer which is normally held up to the ear, a means for effective magnetic wireless coupling to hearing technologies shall be provided.
- (i) Interference to hearing technologies (including hearing aids, cochlear implants, and assistive listening devices) shall be reduced to the lowest possible level that allows a user of hearing technologies to utilize the telecommunications product.
- (j) Products that transmit or conduct information or communication, shall pass through cross-manufacturer, non-proprietary, industry-standard codes, translation protocols, formats or other information necessary to provide the information or communication in a usable format. Technologies which use encoding, signal compression, format transformation, or similar techniques shall not remove information needed for access or shall restore it upon delivery.
- (k) Products which have mechanically operated controls or keys, shall comply with the following:

- (1) Controls and keys shall be tactilely discernible without activating the controls or keys.

- (2) Controls and keys shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate controls and keys shall be 5 lbs. (22.2 N) maximum.

(3) If key repeat is supported, the delay before repeat shall be adjustable to at least 2 seconds. Key repeat rate shall be adjustable to 2 seconds per character.

(4) The status of all locking or toggle controls or keys shall be visually discernible, and discernible either through touch or sound.

**§ 1194.24 Video and multimedia products.**

(a) All analog television displays 13 inches and larger, and computer equipment that includes analog television receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals. As soon as practicable, but not later than July 1, 2002, widescreen digital television (DTV) displays measuring at least 7.8 inches vertically, DTV sets with conventional displays measuring at least 13 inches vertically, and stand-alone DTV tuners, whether or not they are marketed with display screens, and computer equipment that includes DTV receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals.

(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.

(c) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain speech or other audio information necessary for the comprehension of the content, shall be open or closed captioned.

(d) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain visual information necessary for the comprehension of the content, shall be audio described.

(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.

**§ 1194.25 Self contained, closed products.**

(a) Self contained products shall be usable by people with disabilities without requiring an end-user to attach assistive technology to the product. Personal headsets for private listening are not assistive technology.

(b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.

(c) Where a product utilizes touchscreens or contact-sensitive controls, an input method shall be provided that complies with § 1194.23 (k) (1) through (4).

(d) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided.

(e) When products provide auditory output, the audio signal shall be provided at a standard signal level through an industry standard connector that will allow for private listening. The product must provide the ability to interrupt, pause, and restart the audio at anytime.

(f) When products deliver voice output in a public area, incremental volume control shall be provided with output amplification up to a level of at least 65 dB. Where the ambient noise level of the environment is above 45 dB, a volume gain of at least 20 dB above the ambient level shall be user selectable. A function shall be provided to automatically reset the volume to the default level after every use.

- (g) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.
- (h) When a product permits a user to adjust color and contrast settings, a range of color selections capable of producing a variety of contrast levels shall be provided.
- (i) Products shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.
- (j) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following:

- (1) The position of any operable control shall be determined with respect to a vertical plane, which is 48 inches in length, centered on the operable control, and at the maximum protrusion of the product within the 48 inch length (see Figure 1 of this part).

- (2) Where any operable control is 10 inches or less behind the reference plane, the height shall be 54 inches maximum and 15 inches minimum above the floor.

- (3) Where any operable control is more than 10 inches and not more than 24 inches behind the reference plane, the height shall be 46 inches maximum and 15 inches minimum above the floor.

- (4) Operable controls shall not be more than 24 inches behind the reference plane (see Figure 2 of this part).

**Subpart D -- Information, Documentation, and Support**  
**§ 1194.41 Information, documentation, and support.**

- (a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge.
- (b) End-users shall have access to a description of the accessibility and compatibility features of products in alternate formats or alternate methods upon request, at no additional charge.
- (c) Support services for products shall accommodate the communication needs of end-users with disabilities.

**Figures to Part 1194**

**Figure 1**

**Figure 2**

1. Section 508 does not apply to national security systems, as that term is defined in section 5142 of the Clinger-Cohen Act of 1996 (40 U.S.C. 1452).
2. The Access Board is an independent Federal agency established by section 502 of the Rehabilitation Act (29 U.S.C. 792) whose primary mission is to promote accessibility for individuals with disabilities. The Access Board consists of 25 members. Thirteen are appointed by the President from among the public, a majority of who are required to be individuals with disabilities. The other twelve are heads of the following Federal agencies or their designees whose positions are Executive Level IV or above: The departments of Health and Human Services, Education, Transportation, Housing and Urban Development, Labor, Interior,

Defense, Justice, Veterans Affairs, and Commerce; the General Services Administration; and the United States Postal Service.

3. Whenever the Access Board revises its standards, the Federal Acquisition Regulatory Council is required to revise the FAR, and each appropriate Federal agency is required to revise its procurement policies and directives within six months to incorporate the revisions.

4. 48 CFR Chapter 1, part 2, §2.101 Definitions Information Technology.

**§ 1194.26 Desktop and portable computers.**

(a) All mechanically operated controls and keys shall comply with §1194.23 (k) (1) through (4).

(b) If a product utilizes touchscreens or touch-operated controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4).

(c) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided.

(d) Where provided, at least one of each type of expansion slots, ports and connectors shall comply with publicly available industry standards.

**Subpart C -- Functional Performance Criteria**

**§ 1194.31 Functional performance criteria.**

(a) At least one mode of operation and information retrieval that does not require user vision shall be provided, or support for assistive technology used by people who are blind or visually impaired shall be provided.

(b) At least one mode of operation and information retrieval that does not require visual acuity greater than 20/70 shall be provided in audio and enlarged print output working together or independently, or support for assistive technology used by people who are visually impaired shall be provided.

(c) At least one mode of operation and information retrieval that does not require user hearing shall be provided, or support for assistive technology used by people who are deaf or hard of hearing shall be provided.

(d) Where audio information is important for the use of a product, at least one mode of operation and information retrieval shall be provided in an enhanced auditory fashion, or support for assistive hearing devices shall be provided.

(e) At least one mode of operation and information retrieval that does not require user speech shall be provided, or support for assistive technology used by people with disabilities shall be provided.

(f) At least one mode of operation and information retrieval that does not require fine motor control or simultaneous actions and that is operable with limited reach and strength shall be provided.

**Access Board:**

**Section 508 Standards:**

[EIT Accessibility Standards \(Section 508\)](#)

**Technical Guides:**

[Software Applications and Operating Systems \(1194.21\)](#)

[Web-based Intranet and Internet Information and Applications \(1194.22\)](#)

[Telecommunication Products \(1194.23\)](#)

[Video and Multimedia Products \(1194.24\)](#)

[Self-Contained, Closed Products \(1194.25\)](#)

[Desktop and Portable Computers \(1194.26\)](#)

**Summaries of EIT Accessibility Standards Sections**

[Summary of Software Applications and Operating Systems](#)

Access Board's summary of Software Applications and Operating Systems (1194.21)

[Summary of Web-based Intranet and Internet Information and Applications](#)

Access Board's summary of Web-based Intranet and Internet Information and Applications (1194.22)

[Summary of Telecommunication Products](#)

Access Board's summary of Telecommunication Products (1194.23)

[Summary of Video and Multimedia Products](#)

Access Board's summary of Video and Multimedia Products (1194.24)

[Summary of Self-Contained, Closed Products](#)

Access Board's summary of Self-Contained, Closed Products (1194.25)

[Summary of Desktop and Portable Computers](#)

Access Board's summary of Desktop and Portable Computers (1194.26)





## **Part 2: Roles and Responsibilities of the Section 508 Agency-Wide Teams**

This section of the training outlines FAA's commitment and policies and procedures available to ensure the implementation of Section 508 requirements and standards. The specific **FAA policies and procedures** that will be addressed are:

- Secretary Norman Mineta's Electronic and Information Technology Policy Statement
- Daniel Meehan's Memorandum to the Management Board
- The Web Policy Council Notice and Guidance
- Section 508 Help Desk
- Section 508 Coordinators Role and Responsibilities
- Section 508 Coordinators and Points of Contact
- Federal Government Agencies Section 508 Coordinators
- Federal Government Agencies Section 508 Coordinators Manual and Training
- Roles and Responsibilities of the 508 Points of Contact and Agency-Wide Teams
- FAA Plan of Action

**Secretary Mineta's Access to Electronic and Information Technology Policy Statement**

It is the policy of the U.S. Department of Transportation to provide access to all of its programs, services and information to people with disabilities that is comparable to the level of access provided to others. Section 504 of the Rehabilitation Act, and related Departmental regulations, have made this a requirement since 1978. With the passage of recent amendments to Section 508 of the Rehabilitation Act, we must also ensure that the Department's electronic and information technology (EIT) meets specific accessibility standards for people with disabilities, including both employees and the customers we serve, whenever we develop, procure, maintain or use EIT.

Section 508 requires us to provide accessible EIT to the Department's employees with disabilities, to enable them to successfully do their jobs and enjoy the same benefits of training and career opportunities that are available to others in the workforce. Also, Section 508 requires us to provide our customers with disabilities accessible EIT to enable them to enjoy the same benefits of the Department's programs, services and information that are available to others.

To guide us, the U.S. Access Board established new EIT accessibility standards, the General Services Administration issued new EIT acquisition requirements and the Department of Justice (Justice) provided compliance coordination. To implement Section 508, beginning June 21, 2001, the Department must acquire EIT products that meet the new standards and acquisition requirements. In addition, we will strive to develop, maintain, and use EIT that meets the new standards, unless doing so would result in an undue burden. The Department will also cooperate with Justice by providing data about EIT accessibility and other issues.

I am asking all employees to make a strong commitment to providing the Department's programs, services and information, including its EIT, in a format that is accessible to people with disabilities. Also, I am calling on all managers and supervisors to provide the leadership necessary to accomplish these important goals. To help ensure that the Department implements this policy and related requirements, I am directing the Chief Information Officer and the Director of the Departmental Office of Civil Rights to provide policy guidance and technical assistance to the Operating Administrations and Secretarial Officers. Additionally, I expressly delegate to all Administrators the responsibility to conduct compliance procedures, including the processing of complaints and appeals, covered by 49 C.F.R. Part 28.

Norman Y. Mineta

**Daniel Mehan Memorandum to the Management Board**

Subject: INFORMATION: Current Status of Section 508 Implementation

Date: June 07, 2001

From: Assistant Administrator for Information Services and Chief Information Officer

To: Management Board

Section 508 of the Rehabilitation Act of 1973 requires that the FAA acquire Electronic Information Technology (EIT) that accommodates disabilities of both our staff and customers. Enforcement of Section 508 begins on June 21. The requirements are far reaching, affecting the acquisition of copiers, computers, fax machines, information kiosks, software, operating systems, web sites, and telecommunication products. My office, working with the various LOB's, is coordinating the agency's implementation of Section 508. The steps in the implementation process that must be completed by June 21 in order to show due diligence and a good faith effort are:

1. Ensure that the top 20 web pages visible to the public comply with web accessibility guidelines based on the interpretation of the EIT Accessibility Standards published December 22, 2000.
2. Establish and announce a process by which Federal employees and members of the public who believe an accommodation has not been made can file a complaint as well as develop internal procedures to handle the processing of informal complaints.
3. Update procurement policy in the AMS to require compliance with Section 508 and issue interim guidance to contracting officers on how to apply the policy.

We are working to meet the June 21 deadline for these three steps. In the long term, the agency must ensure that all web sites, both internal and external, comply with accessibility guidelines and ensure that everyone who acquires EIT within the FAA has full and clear direction on how to be compliant with Section 508.

Section 508 is not retroactive, i.e., it does not require an agency to retrofit or replace equipment and software that is not 508 compliant. However, new procurements must be compliant after June 21. Small micro-purchases that are under \$2,500 are exempt from compliance prior to January 1, 2003. These purchases are usually made with a credit card and are generally impractical to comply with the EIT accessibility standards. There is also an exception when acquisition of EIT would pose an "undue burden" on the agency.

There is no clear guidance within the government and industry right now as to what constitutes "undue burden" and what steps we must take to be compliant and demonstrate compliance. Section 508 allows lawsuits for non-compliance under existing sections of the Rehabilitation Act and it is expected that a number of lawsuits will be filed after June 21.

AIO has the lead to work with DOT, the LOB's, and the staff offices to develop the agency's long-term approach to Section 508. Calvin Mitchell and Deborah Douglas-Slade from my office have the lead for me and will continue to work with your staff. The list of Section 508 points of contact for each member of the Management Board is attached to this memo.

Your cooperation and support in this important effort are appreciated.

Daniel J. Mehan

## **Section 508 Help Desk Procedures**

A link should be on every page for customers/employees to be able to request accessibility assistance. The link for external pages is

Accessibility Assistance, <http://www.faa.gov/aio/508>, and the link for internal pages is Section 508 Assistance <http://interweb.faa.gov/aio/508>.

If this is not possible, then a link on the front page of the website will be sufficient.

When a request is submitted to the Accessibility Help Desk, the Accessibility Help Desk will determine if the request is for information or accessibility to information. If the request is for information; then the Accessibility Help Desk will forward the request to the appropriate LOB. The LOB will then resolve the request.

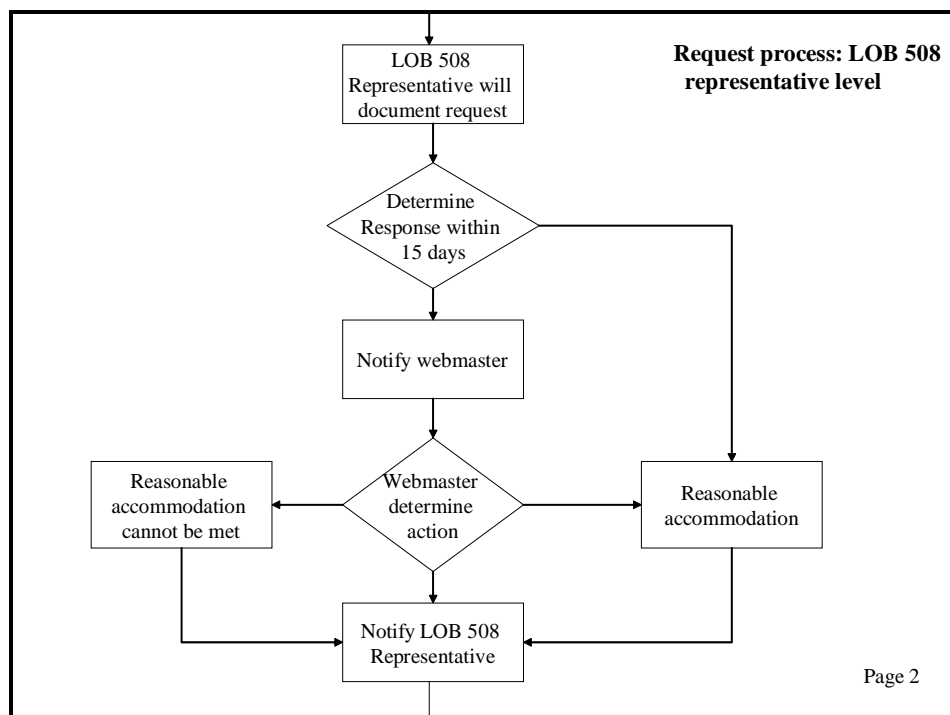
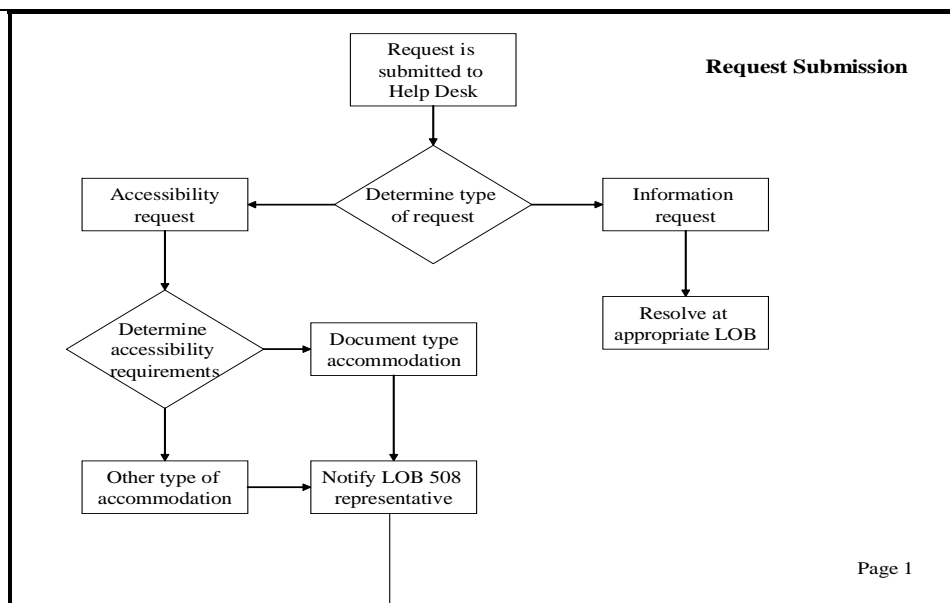
If the request is for accessibility to information, the Accessibility Help Desk will determine if the request is for a document (i.e. PDF) in an accessible format or accessibility to online forms, web pages, images, tables, etc. Once the Accessibility Help Desk has determined the request, it will be forwarded to the appropriate LOB 508 representative with the documentation.

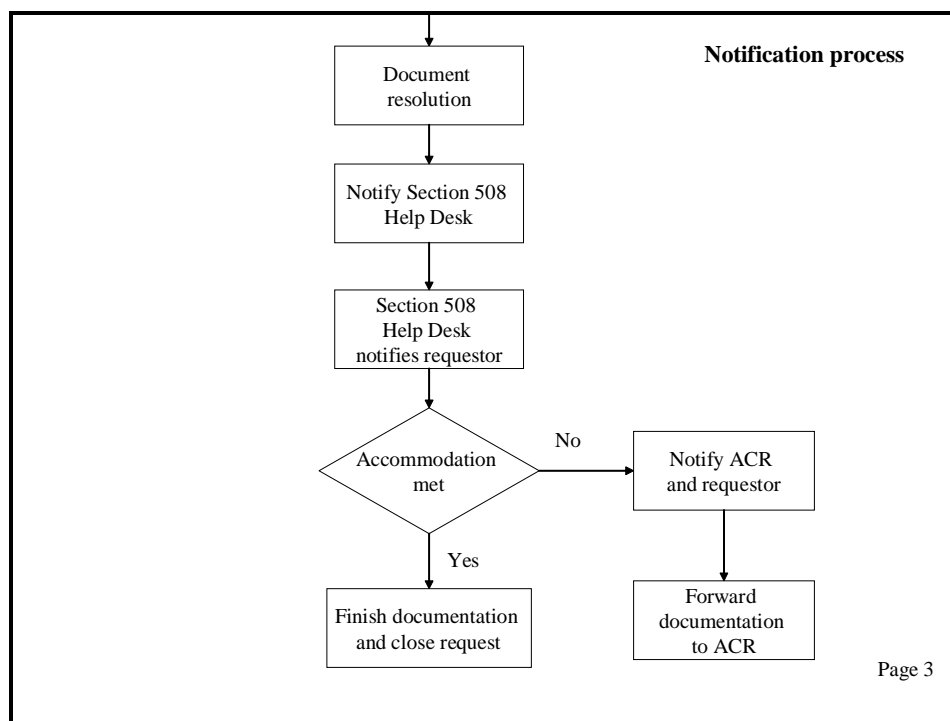
The LOB 508 representative will maintain documentation of the request through email. Upon receiving the email request, the LOB 508 representative will have 15 days to resolve the request. If the LOB 508 representative can resolve the request, the representative will document the resolution and notify the Accessibility Help Desk of the resolution as well as the requestor.

If the LOB 508 representative sends the request to the appropriate Webmaster for resolution, then the Webmaster will determine if a resolution is applicable. If the request is resolved, then the Webmaster will notify the LOB 508 representative. The representative will then notify the Accessibility Help Desk of the resolution as well as the requestor.

If the Webmaster cannot provide a resolution to the request, then the Webmaster will then notify the LOB 508 representative that a resolution could not be attained and state the reason why. The representative will then notify the Accessibility Help Desk that a resolution could not be attained. The Accessibility Help Desk will then notify the requestor that a resolution could not be attained and a form letter from ACR will be sent to the requestor.

All documentation regarding requests that cannot be resolved will be forwarded to ACR.







This section of the training outlines the roles and responsibilities of the FAA Section 508 Coordinator in the implementation of Section 508 requirements and standards.

## **SECTION 508 COORDINATORS ROLE AND RESPONSIBILITIES**

### **MISSION OF THE 508 EIT COORDINATOR**

To coordinate, facilitate, and train managers, employees, and contractors and develop crosscutting policies and procedures in each Line of Business/Staff Office (LOB/SO), Regions, and Centers on the Electronic Information Technology (EIT) Access Board's Standards to ensure that all FAA employees and customers have equal access to programs, information and services.

### **ROLES AND RESPONSIBILITIES OF THE FAA SECTION 508 COORDINATOR**

**Role:** The FAA Section 508 Coordinator, operates as the technical authority, and manages the implementation of Section 508 within the agency. The Coordinator organizes teams with the required expertise, to develop procurement policies and procedures, develops processes and methods to ensure the execution of implementation plans, monitors implementation plans and action plans to ensure 508 compliance, establishes a complaint procedure, and institutes new agency reporting requirements for EIT compliance, accessibility and usability. The Section 508 Coordinator is required to keep abreast of emerging assistive technologies that are being developed by vendors and industry. The Section 508 Coordinator is certified to operate as a Chief Information Officer.

#### **Provide reports to the FAA, Administrator on the 508 Programs's yearly accomplishments, planned accomplishments and impacts on agency-wide resources.**

- Coordinate with the Office of Civil Rights, People with Disabilities Program Manager, and other activities i.e. Human Resources, Legal, and Disabilities Resources Center (DCR) to identify evolving compliance needs.
- Analyze the projected needs of the FAA LOB's, regions, and centers to ensure 508 compliance.
- Estimate the resources required to ensure 508 agency-wide compliance.
- Develop measures to determine the effectiveness of 508 in ensuring people with disabilities are afforded an equal opportunity for access to services, programs, and information.

#### **Provide progress reports and ad hoc information to the Chief Information Officer (CIO) related to the implementation of Section 508.**

- Provide weekly status reports and executive summaries to the CIO, Deputy CIO, and senior-level management.
- Document weekly activities related to Section 508 on a weekly basis to include conferences, training, and meetings with POCs, vendors, federal agency 508 Coordinators, program offices, staff offices, and regional personnel.
- Develop weekly executive summaries that identify progress and problems that impact the

implementation of 508 within the agency to the CIO, Deputy CIO, and senior-level management's review.

**Work with the Office of Secretary (OST) to ensure that the FAA implementation efforts are consistent with departmental policy guidance.**

- Meet and coordinate with the Department of Transportation's 508 Coordinator to ensure Departmental policy and procedures are implemented, where applicable.
- Attend the bi-weekly or whenever designated DOT 508 Steering Committee Meetings.
- Participate in the DOT 508 Steering Committee Meeting and participate in solving problems that are impeding the success of 508 within the FAA.
- Provide technical assistance to the DOT CIO's office and OST offices in the implementation of 508 within the Department.
- Work with the DOT Section 508 Coordinator to implement an automated tool within the FAA and develop processes for monitoring PageScreamer Central.
- Work with automated tool vendor and other contract personnel to provide solutions to problems identified with the software tool and management processes.
- Collect data from FAA's Lines of Business and Centers to input into the automated tool database and tracking system.

**Provide programmatic and technical guidance and assistance to the Lines of Business/Staff Office, centers, and regional offices regarding the implementation of Section 508 of the Rehabilitation Act, as amended.**

- Provide written answers to questions from the Lines of Business/Staff Office, centers, and regional office regarding 508 implementation.
- Obtain feedback and share with the Lines of Business, centers, and regional office 508 implementation concerns, issues, and best practices.
- Research and share 508 training opportunities that are available in the Department, federal government, and industry.
- Staff a help-desk function that answers questions relative to the Access Board's standards, and software tools.

**Provide on-going consultative assistance to the Lines of Business/Staff Office, centers, and regional offices regarding Section 508 compliance issues and interpretation of the Access Board's technical standards.**

- Develop and/or send via e-mail Section 508 information to the Section 508 Coordinators relative to updates to the Access Board's standards.
- Develop and send via e-mail correspondence from the Access Board, GSA, and other federal agencies.

**Consult with DRC to acquire Section 508 awareness (briefings, demonstrations, and handouts) to assist the FAA in achieving 508 compliance.**

- Request assistance when convening accessible meetings and other gatherings.
- Obtain consultation, testing, and demonstrations of assistive technologies in use by FAA disabled employees.
- Participate in meetings with the DOT disabled community and other disabled persons to provide input on policy options and possible choices, establishing priorities, system

provide input on policy options and possible choices, establishing priorities, system selection, and technological evaluations to support DOT accessibility efforts.

- Assist the DRC in the development of processes and procedures that will ensure all FAA employees and customers have equal access to programs, information, and services.

**Establish a Section 508 IT Accessibility Team that includes Section 508 Coordinators in the lines of business/staff office, regions and centers.**

- Identify a Section 508 coordinator for each line of business/staff office, region and center. (These 508 coordinators should have skills as Information Technology professionals, procurement professionals, webmaster and developers, Legal representatives, and Human Resources representatives.)
- Schedule meetings and develop agendas for monthly meeting with the 508 coordinators.
- Send monthly FAA 508 Coordinator's status reports to the Headquarters, regions, and centers coordinators, CIO, Deputy CIO, and senior-level management.
- Develop specific duties and responsibilities for the 508 coordinators.
- Develop and organize the required teams with the specific level of expertise to execute 508 within the agency.
- Develop training awareness packets of information to provide to the team members.

**Coordinate and distribute Section 508 information to the lines of business/staff office, regions, and centers Section 508 coordinators from DOT/OST, external entities, etc.**

- Send, receive, and exchange 508 data and information from the lines of business, staff office regions, and centers coordinators, DOT/OST, external entities i.e. Department of Justice, Office of Management and Budget, other federal agencies, Federal Agency 508 Coordinators, Access Board, and Federal CIOs.

**Coordinate and ensure education and awareness of all employees within the FAA.**

- Develop a 508 agency-wide training program within the agency.
- Schedule and budget the training process.
- Develop a 508 Statement of Work for training.
- Establish a "train the trainer" process for Section 508.
- Provide awareness training to employees on the overview of Section 508 to include the history, Legal implications, 508 Procurement and Policies, FAA's Standard Operating Procedures, and "specific" training sessions on the applicable provisions. The provisions will include:
  - Section 1194.21 Software Applications and Operating Systems
  - Section 1194.22 Web-based internet information and applications
  - Section 1194.23 Telecommunications Products
  - Section 1194.24 Video and Multi-media Products
  - Section 1194.25 Self-contained, Closed Products
  - Section 1194.26 Desktop and Portable Computers
  - Section 1194.31 Functional Performance and Criteria
  - Section 1194.41 Information, Documentation and Support
- Develop "specific" organizational examples of the Access Board's provisions application within the FAA that can be included in the Section 508 training sessions.
- Develop awareness training sessions for staff offices, senior management, and contractors.

- Develop a training measurement process that shows FAA's progress in training personnel on the 508 awareness and specific provisions.
- Ensure that groups responsible for: implementing the Government Paperwork Elimination Act (GPEA), the Government Performance and Results Act (GPRA), the Agency's Enterprise Architecture, Security Policies, Change Control Boards, Tools Selection Committees, Standards Workgroups, Electronic Service Delivery Committees, etc. include 508 in their work plans and policies. Give presentations and/or educate these groups on Section 508 to make sure that they are considering the Section 508 standards when developing, procuring, or maintaining EIT.

**Brief senior management on the progress, problems, and resource requirements for 508.**

- Develop briefings for senior management board to educate on 508 requirements.
- Develop briefings for FAA CIO's to educate on 508 requirements.
- Develop briefings for senior management and CIO's that identify major obstacles that impede the success of 508.
- Develop and coordinate the activities of the 508 Policy and Planning Team with senior management to ensure the inclusion of 508 activities in FAA's yearly budget process.

**Monitor the Access Board ([www.access-board.gov](http://www.access-board.gov)) and the General Services Administration (GSA) ([www.section508.gov](http://www.section508.gov)) web sites for new guidance and training opportunities.**

- Review each web site weekly for new guidance and updates.
- Inform Section 508 coordinators and points of contact of new guidance and updates.
- Provide update links from the access board and section 508 web sites to the AIO 508 web site (<http://interweb.faa.gov/AIO/508>).
- Research Section 508 web sites of other federal and State government and industry to acquire knowledge and information about Section 508. Link this information to the AIO 508 web site.

**Attend conferences with industry and other Federal agencies to acquire knowledge and information about Section 508.**

- Review federal agencies and industry Section 508 web sites to learn of the required training necessary to implement Section 508.
- Review industry web sites to learn of conferences and industry training opportunities.
- Send e-mail notification and make all training opportunities available to the Section 508 coordinators and Points of contact.

**Prepare policies and procedures for the development of requirements for promulgation by the CIO.**

- Develop policy and guidance to include in the Acquisition Management System.
- Develop agency-wide policy (FAA order) to facilitate 508 within the agency.
- Develop policy statements for the CIO and Deputy CIO's concurrence.
- Coordinate interviews on Section 508 with Public Affairs, the CIO and Deputy CIO.
- Communicate and negotiate with the 508 Procurement Team to develop agency-wide guidance.

guidance.

- Develop videos on Section 508 for its implementation within the agency.
- Review, analyze, and respond to feedback from the regions and Headquarters relative to Section 508.
- Develop 508 Standard Operating Procedures that will be posted on the FAA Section 508 web site.
- Develop processes and procedures that include the 508 provisions in FAA's system life cycle development.

**Develop and implement methods for monitoring adherence to Section 508 policies and procedures.**

- Develop a model (line of business, region or center) procedures and methods to monitor adherence to Section 508 policies and procedures.
- Inform 508 POCs of the Department of Justice reporting requirements.
- Develop processes and procedures for monitoring, tracking, and reporting DOJ 508 requirements within the FAA.

**Coordinate with training personnel to add disability awareness and accessibility training into agency-wide training programs.**

- Participate in the People with Disabilities meetings/telecons to determine the best approach to ensure Section 508 is included in 504 training processes.
- Meet with Human Resources to ensure that all training programs include Section 508.

**Develop an Intranet page off the agency web site to share 508 information and link to the Section 508 standards, internal guidelines, points of contact, and available training.**

- Provide guidance to the AIO technical support (contractor) on the appropriate documents and policies to post to the web site.
- Develop a process for quality assurance for all documents and information posted to the web site.
- Establish a process to post and review information posted to the web site on a weekly basis.
- Track and respond to accessibility issues and inquiries made to the AIO website relative to accessibility.

**Provide guidance on the development of agency-wide 508 implementation plans for each line of business to ensure compliance with: web sites, procurement/acquisition, complaint processing, EEO satisfaction survey, telecommunications, software, video and multimedia, self-contained and closed products and desktop and portable computers.**

- Develop guidance on the development of an agency-wide implementation plan or an individual implementation plan within the agency.
- Coordinate the activities of the Section 508 coordinators and Points of Contact and various teams to determine the best means to use to develop a viable implementation plan within the agency.

**Provide progress and ad hoc reports to the CIO.**

- Provide weekly status reports to the CIO.
- Provide executive summaries to the CIO that addresses problems that impact the success of 508 within the agency.

**Develop and contribute input on the CIO's Report to the Department of Justice.**

- Develop processes to track the following issues within the agency that may be reported to the DOJ:

- (1) Section 508 compatibility with assistive technology
- (2) Availability of Help Services for Section 508
- (3) Resolution of complaints-The number of allegations.
- (4) Document defenses-Undue burden and nonavailability of electronic information technology
- (5) Major steps taken to comply with Section 508
- (6) Impacts of 508 on procurement practices
- (7) Good practices/agencies steps to address good practices and recommendations
- (8) What provokes an undue burden?
- (9) Section 508 complaints filed with agency
- (10) What the agency does once it receives a complaint? (follow the 504 complaint process)
- (11) Internet and Intranet Website compliance with Section 508

**508 LONG-TERM OBJECTIVES-Institutionalization of processes and procedures within the FAA.**

**Ensure the institutionalization of the Access Board's Provision-Section 1194.21 Software Applications and Operating Systems within the FAA.**

- Advise and meet with program offices, Lines of Business/Staff Office (LOB/SO), regional offices, and centers to inform of the Access Board provisions for this standard.
- Track and record meetings within FAA relative to this provision.
- Request feedback and advise from Legal 504/508 on the provisions for this standard.
- Collect best practices from other Section 508 Coordinators, program offices, regional offices, and centers relative to this standard.
- Advise the program offices, LOB/SOs, regional offices, and centers on how to conduct an accessibility inventory or assessment on a periodic basis.

**Ensure the institutionalization of the Access Board's Provision-Section 1194.22 Web-based Internet information and applications within the FAA.**

- Organize Webmasters and Information Technology personnel in the Lines of Business/Staff Office to ensure compliance with 508 legislation.
- Monitor and track the distribution of 508 Accessibility Guidelines and Checklist to webmasters, 508 coordinators.

- Monitor the development of the FAA 508 web site development and content information.
- Oversee the effort necessary to bring the Top 20 web pages into compliance, and develop a plan to bring the remaining Web pages and all FAA sites into compliance.
- Monitor webmasters and web developers compliance with Section 508 web based compliance.
- Review AIO policy, procedures, and orders to ensure the inclusion of Section 508.
- Evaluate for accessibility new Web pages before they are posted. Existing web pages should be tested as they are updated. Testing should be done with text-only browsers and, where possible, with assistive technology such as screen reading software to ensure that the experience of users with disabilities is comparable to others.
- Review style guidelines to ensure they will maximize the accessibility of FAA's web pages.
- Post to Operating Administration's Web pages an e-mail address or other accessible method through which users with disabilities can inform the administration's point-of-contact of any accessibility barriers encountered.
- Ensure that the accessibility information logo (and alternative text label) is placed in the uppermost left-hand corner of the Operating Administration's Web pages. The logo and (and text label) will link people with disabilities who use their Web pages with appropriate accessibility instructions and information.
- Develop a process for reporting accessible web site progress to the Department of Transportation and the Department of Justice.

### **Ensure the institutionalization of the Access Board's Provision-Section 1194.23 Telecommunications Products within the FAA.**

- Review FAA procurement contracts, when requested, to ensure the required provisions are included.
- Review procurements on a case-by-case basis to ensure the Access Board provisions are included.
- Collect best practices from other Section 508 Coordinators, program offices, regional offices, and centers relative to this standard.
- Advise FAA personnel of training opportunities, etc. to facilitate compliance with this provision.
- Provide information on holding accessible meetings to all organizational components.
- Continually, train FAA employees on the Acquisition Management Guidance, the standard operating procedures, and any other procurement guidance.

### **Ensure the institutionalization of the Access Board's Provision-Section 1194.24 Video and Multi-Media within the FAA.**

- Advise and meet with program offices, Lines of Business, regional offices, and centers to inform of the Access Board provisions for this standard.
- Track and record meetings within FAA relative to this provision.
- Request feedback and advise from Legal 504/508 on the provisions for this standard.
- Collect best practices from other Section 508 Coordinators, program offices, regional offices, and centers relative to this standard.

offices, and centers relative to this standard.

- Advise the program offices, LOB/SOs, regional offices, and centers on how to conduct an accessibility inventory or assessment on a periodic basis.

**Ensure the institutionalization of the Access Board's Provision-Section 1194.25 Self-contained, Closed Products within the FAA.**

- Advise and meet with program offices, Lines of Business, regional offices, and centers to inform of the Access Board provisions for this standard.
- Track and record meetings within FAA relative to this provision.
- Request feedback and advise from Legal 504/508 on the provisions for this standard.
- Collect best practices from other Section 508 Coordinators, program offices, regional offices, and centers relative to this standard.
- Ensure clear instructions in accessible formats on how to use features found on office machines e.g., fax machines, copiers, and printers, are available to people with disabilities.
- For inaccessible IT office equipment that is available to the general public or a large number of employees, ensure that accessible instructions are available on how a person with a disability can obtain accessible alternative services (e.g., where to seek assistance).
- Advise the program offices, LOB/SOs, regional offices and centers on how to conduct an accessibility inventory or assessment on a periodic basis.

**Ensure the institutionalization of the Access Board's Provision-Section 1194.26 Desktop and Portable Computers within the FAA.**

- Advise and meet with program offices, Lines of Business/Staff Offices, regional offices, and centers to inform of the Access Board provisions for this standard.
- Track and record meetings within FAA relative to this provision.
- Request feedback and advise from Legal 504/508 on the provisions for this standard.
- Collect best practices from other Section 508 Coordinators, program offices, regional offices, and centers relative to this standard.
- Advise the program offices, LOB/SOs, regional offices and centers on how to conduct an accessibility inventory or assessment on a periodic basis.

**Ensure the institutionalization of the Access Board's Provision-Section 1194.31 Functional Performance and Criteria within the FAA.**

- Advise and meet with program offices, Lines of Business, regional offices, and centers to inform of the Access Board provisions for this standard.
- Track and record meetings within FAA relative to this provision.
- Request feedback and advise from Legal 504/508 on the provisions for this standard.
- Collect best practices from other Section 508 Coordinators, program offices, regional offices, and centers relative to this standard.
- Advise the program offices, LOB/SOs, regional offices, and centers on how to conduct an accessibility inventory or assessment on a periodic basis.



**Ensure the institutionalization of the Access Board's Provision-Section 1194.41  
Information, Documentation and Support.**

- Advise and meet with program offices, Lines of Business, regional offices, and centers to inform of the Access Board provisions for this standard.
- Track and record meetings within FAA relative to this provision.
- Request feedback and advise from Legal 504/508 on the provisions for this standard.
- Collect best practices from other Section 508 Coordinators, program offices, regional offices, and centers relative to this standard.

**SECTION 508 COORDINATORS AND POINTS OF CONTACT**

**Table of Contents**

1. AIO
2. ARC
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6. AGC
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12. ASY
13. AVR
14. ATS
15. ARA
16. AOZ
17. ASY
18. ASH
19. AEP
20. CMD
21. Mike Monroney Aeronautical Center
22. William J. Hughes Technical Center

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FAA SECTION 508 TELEPHONE LISTING UPDATED 10/15/03

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**Department of Veterans Affairs**

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**Equal Employment Opportunity Commission**

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**Federal Election Commission**

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Blake Lange - [blange@fec.gov](mailto:blange@fec.gov)

**Federal Energy Regulatory Commission**

Beth Taylor - 202-208-0826 - [elizabeth.taylor@ferc.fed.us](mailto:elizabeth.taylor@ferc.fed.us)

**Federal Emergency Management Agency**

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Florence Carr - 202-523-5800 - [florence@fmc.gov](mailto:florence@fmc.gov)

**Federal Mediation and Conciliation Service**

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**Federal Mine Safety & Health Review**

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**Federal Reserve System, Board of Governors Commission**

Katie Meskill - 202-452-2331 - [katie.meskill@frb.gov](mailto:katie.meskill@frb.gov)

**Federal Retirement Thrift Investment**

**Federal Trade Commission**

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**General Accounting Office**

**General Services Administration**

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Douglas Smith - 202-501-2995 - [douglas.smith@gsa.gov](mailto:douglas.smith@gsa.gov)

**Harry S. Truman Scholarship Foundation**

**Holocaust Memorial Museum**

**Institute of Museum and Library Services**

Barbara G. Smith - 202-606-5254 - [bsmith@imls.gov](mailto:bsmith@imls.gov)

**Inter-American Foundation**

**Internal Revenue Service**

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Andre Wilson - 202-622-8155 - [Andre.Wilson@irs.gov](mailto:Andre.Wilson@irs.gov)

**Japan-U.S. Friendship Commission**

**Library of Congress**

**Marine Mammal Commission**

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**Merit Systems Protection Board**

Robert Taylor - 202-653-8887 - [bob.taylor@mspb.gov](mailto:bob.taylor@mspb.gov)



Robert Taylor - 202-653-8887 - [bob.taylor@mspb.gov](mailto:bob.taylor@mspb.gov)

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**National Archives & Records Administration**

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Marilyn Stachelczyk - [marilyn.stachelczyk@nara.gov](mailto:marilyn.stachelczyk@nara.gov)

**National Capitol Planning Commission**

**National Commission on Libraries and Information Services**

**National Credit Union Administration**

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**National Council on Disability**

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Martin Gould - [mgould@ncd.gov](mailto:mgould@ncd.gov)

**National Endowment for the Arts**

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**National Endowment for the Humanities**

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**National Imagery and Mapping Agency**

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**National Institute of Standards and Technology**

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**National Labor Relations Board**

**National Mediation Board**

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**National Science Foundation**

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**Neighborhood Reinvestment Corporation**

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**National Oceanic and Atmospheric Administration**

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**Nuclear Regulatory Commission**

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**Occupational Safety & Health Review Commission**

**Office of Comptroller of the Currency**

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**Office of Navajo & Hopi Indian Relocation**

**Office of Personnel Management**

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**Office of the Secretary of Defense**

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**Office of Special Council**

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**Pension Benefit Guaranty Corporation**

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**Railroad Retirement Board**

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**Securities and Exchange Commission**

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**Social Security Administration**

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**Tennessee Valley Authority**

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**Trade and Development Agency**

**U.S. Coast Guard**

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**United States Information Agency**

### United States Product Safety Commission

Robert B. Ochsman - 301-504-0426 x1307

Section 508 Coordinator's listing is subject to updates. Refer to [www.Section508.gov](http://www.Section508.gov).

## 508 and You - Section 508 Coordinator

Federal Section 508 Coordinators are responsible for organizing and supporting the implementation of Section 508 within their respective departments and agencies and have been appointed by their department/agency as the central point of contact for information concerning accessibility issues and solutions. We have a complete [list of Federal agency coordinators](#). If your department/agency does not currently have a Section 508 Coordinator or is not listed you should contact your Office of the Chief Information Officer (OCIO). If you do not have an OCIO, contact whoever is in charge of Electronic & Information Technology. Some Section 508 Coordinator responsibilities include:

- Define the roles and responsibilities of the Coordinator, establish a team of subject matter experts to assist, and coordinate all reporting requirements.
- Coordinate the integration of Section 508 accessibility needs into department/agency budget, strategic, and IT capital plans.
- Support validation of accessible IT systems performance prior to deployment.
- Coordinate and provide sources of education and training to key personnel within the department/agency, identify available resources, and stay abreast of procurement changes to the FAR that will affect the purchase of any new equipment or software.

Section 508 Coordinators should establish contacts with other department/agency coordinators to share information about your organizations' implementation strategies. CITA hosts a [Section 508 Coordinators' secure online forum](#) to facilitate the exchange of information between coordinators. The forum is limited to use by Section 508 Coordinators only. If you need information on how to access the working area please contact either [Helen Chamberlain](#) at 202-219-2348 or [Quentis Scott](#) at 202-208-4134.

A revised 508 Coordinators Reference Manual 11-16-01 can be found on the [Section508.gov](http://Section508.gov) web site link below:

[www.section508.gov/index.cfm?FuseAction=Content&ID=90](http://www.section508.gov/index.cfm?FuseAction=Content&ID=90)

This section of the training outlines FAA's Section 508 Points of Contact and Agency-Wide Teams established to implement Section 508 requirements and standards. Team members are identified along with their role and responsibilities. The sections are:

- Role and Responsibilities of the 508 Points of Contact
- Agency-wide Point of Contact Team
- Role and Responsibilities of Section 508 Coordinators and Points of Contact Team
- Procurement Team
- Role and Responsibilities of FAA 508 Procurement Team

- Role and Responsibilities of Legal Team
- Role and Responsibilities of the Policy and Planning Team
- Training Team
- Role and Responsibilities of Assessment Team
- Self-Assessment Team Questions
- Role and Responsibilities of Web Masters/Web Developers
- Role and Responsibilities of People with Disabilities Team
- Additional Teams

## **ROLE AND RESPONSIBILITIES OF THE SECTION 508 COORDINATORS AND AGENCY-WIDE TEAMS**

FAA's Section 508 Team consists of personnel from various Lines of Business (LOB) and Staff Offices (SO). The LOBs have identified personnel that are working together to act as points of contact, develop interim guidance and procedures, research and analyze issues, and communicate the importance of Section 508. In the near-term, personnel from many functions and disciplines, such as Civil Rights, Human Resources, Staff Offices, webmasters, Information Technology, Procurement and Legal have come together in partnership to ensure success of this effort within the agency. The Office of Assistant Administrator for Information Services and Chief Information Officer (AIO) has taken the leadership role and is actively working with the LOBs to ensure that employees and customers have access to information and technologies throughout the agency. To-date, the following teams have formed within the agency: Section 508 Working Group, 508 Procurement Team, and the 508 Training Team.

The Web Policy Council (Council) is instrumental in the development of interim design and content standards for all publicly available internet components of the FAA web. The Council's notice requires that FAA personnel comply with Section 508 of the Rehabilitation Act. It is the FAA's goal to have all materials on its web comply with the requirements of Section 508.

Additional teams will form after the Section 508 Training is provided to FAA personnel. Training will heighten the awareness and provide an understanding of the need to fulfill the additional requirements necessary under Section 508.

### **AGENCY-WIDE SECTION 508 COORDINATORS**

An interagency team was established in June of 2001 with the support of the Assistant Administrator for Information Services and Chief Information Officer and the FAA Management Board. (See Memorandum dated June 07, 2001, Subject: Current Status of Section 508 Implementation)

The LOB/SO 508 coordinators are primarily required to facilitate the compliance of web sites and other activities identified in the Section 508 Compliance Plan within the agency. Legal representatives located under the 508 Points of Contact listing provide legal advice. Their role and responsibilities are identified under the Legal Team. However, the primary responsibilities of the present 508 coordinators are to facilitate the compliance of web sites within the FAA. The below listed responsibilities are subject to change as the roles and responsibilities evolve that impact web content and design within the FAA. All changes to roles and responsibilities will be reflected on the [Section 508 web site](http://intranet.faa.gov/aio/508) located at <http://intranet.faa.gov/aio/508>.

## **ROLE AND RESPONSIBILITIES OF Headquarter, region, and center 508 Coordinators**

### **“Specific” Role and Responsibilities of the 508 Coordinators**

**Role:** The FAA 508 Coordinators in Headquarters, regions, and centers should facilitate the compliance of web sites and other activities identified in the FAA Compliance Plan.

**Responsibilities:**

- Complete FAA's 5 Steps to 508 Web Accessibility for Webmasters and Web Developers
- Assist in the development of 508 web site implementation plans and compliance plans.
- Provide reports and information that are requested by the Section 508 Coordinator about the 508 program within your LOB/SO in an expeditious manner.
- Send e-mail received from the Section 508 Coordinator to others (points of contact) in the LOB/SO.
- Keep abreast of 508 standards and its impact on the LOB/SO.
- Visit the following web sites on a weekly basis: <http://www.intranet.faa.gov/AIO/508>, [www.access-board.gov](http://www.access-board.gov), and <http://www.section508.gov>.
- Collect 508 issues that impact the LOB/SO and report to the Section 508 Coordinator on a monthly basis (present during the Section 508 Coordinator's monthly telecons/meetings).
- Present feedback and recommendations on how to institutionalize the Section 508 process within the agency.
- Determine the personnel (focal points that are major implementators) within the LOB/SO for the Access Board Standards:
  - 1194.21 Software applications and operating systems
  - 1194.22 Web-based Intranet and Internet information and applications
  - 1194.23 Telecommunication Products
  - 1194.24 Video and Multimedia Products
  - 1194.25 Self contained, closed products (Kiosks, ATMs, etc.)
  - 1194.25 Desktop and portable computers
  - 1194.31 Functional Performance Criteria
  - 1194.41 Information, Documentation and Support

Visit these personnel (focal points that are major implementators) and obtain feedback and suggestions on how to improve the 508-implementation process.

- Obtain training on the 508 Access Board Standards and facilitate this training within your LOB/SO.
- Attend and participate in monthly 508 Coordinator Meetings. Bring to the meetings/telecons, the following:
  - 508 issues i.e. costs, resources that are impacting the LOB/SO, region, center
  - Feedback and suggestions for improvements to the 508 program within your LOB/SO, region, and center and the agency
  - Identify the skill sets, costs, and resources that are required to successfully implement the 508 program within the LOB/SO, region, and center.
- Facilitate the assessment process within the LOB/SO, region, and center.
- Update the Section 508 Compliance Plan, when necessary.
- Implement the Section 508 Compliance Plan.
- Respond to inquiries from the FAA Section 508 Coordinator.

**SECTION 508 PROCUREMENT TEAM**

The Section 508 Procurement team formed in approximately May of 2001 to develop policies and procedures that would facilitate the implementation of Section 508 within the agency. They produced the 508 Standard Operating Procedures (SOP) for Procurement and played a significant role in the development of the Section 508 clauses. In February of 2002 in San Diego, California, the Contract Administration Work Group met and developed Section 508 clauses and updates to the 508 SOP.

The 508 Procurement Team Members are as follows:

AGC Robert Zuckerman  
ARA Alphonso Barr  
ARA Ralph Randall  
ARA Martha Weaver  
AIO Deborah Douglas-Slade

The Contract Administration Workgroup is as follows:

AMQ Pete Dills  
ASU Ralph Randall (Facilitator)  
AGC Bob Zuckerman  
AEA Terry Mirro  
ASO Ima LaMar  
ASU David Peterson  
AIO Deborah Douglas-Slade (Facilitator)

## **ROLE AND RESPONSIBILITIES OF FAA SECTION 508 PROCUREMENT TEAM**

**Role:** The 508 Procurement Team will review, research, analyze, and develop processes and procedures to effectively implement Section 508 standards within the agency. The team will develop crosscutting methods and techniques to ensure the needs of users with disabilities are taken into consideration during acquisition planning, procurement, and testing processes. Also, the team will develop a training awareness plan and/or make management, procurement, and technical personnel aware of Section 508, when required.

### **Responsibilities:**

- Develop policy and guidance to include in the FAA Acquisition and Management System.
- Develop 508 Standard Operating Procedures.
- Monitor the Access Board standards for changes in technology and revise agency procurement policies and directives, as necessary, to incorporate the revisions.
- Advise on the development of Section 508 contract language for use in procurements.
- Review and comment on updates/revisions to the FAR language and make changes to FAA policy and procedures, when required.
- Refer agency personnel involved in EIT procurements to appropriate agency and

external resources to ensure Section 508 requirements are incorporated in requirements as applicable.

- Ensure that undue burden documentation, when appropriate, is prepared and maintained within that contract file.
- Ensure that all procurements apply the agency's market research and requirements development procedures to contracting actions. In accordance with the SOP, the requiring official (not the contracting official) must:
- Identify which standards apply to the procurement.
- Perform market research to determine the availability of compliant products and services (using vendor web sites and the Section 508 web site, which will link to vendors who describe their accessibility).
- Identify which standards, if any, would not apply in a procurement because of non-availability or undue burden and provide written documentation to the contracting officer for inclusion in the contract file.
- Draft technical specifications and minimum requirements to be submitted with the purchase request.
- Meet with the integrated Product Teams and provide advice on how to best implement the 508 provisions in its processes.

The 508 Procurement Team is required to conduct roles and responsibilities that facilitate the 508 compliance of procurement activities within the agency. The below listed responsibilities are subject to change as the Access Board and the General Services Administration issue additional and updated Section 508 policies and procedures. All changes to the FAA 508 Procurement Team's roles and responsibilities will be reflected on the [Section 508 web site](http://intranet.faa.gov/aio/508) located at <http://intranet.faa.gov/aio/508>.

## **ROLES AND RESPONSIBILITIES OF THE LEGAL TEAM**

**Role:** To provide guidance and legal advise to FAA employees and managers on matters relating to Section 508 and Section 504 of the Rehabilitation Act.

### **Responsibilities:**

Provide legal opinions regarding disability discrimination, including such matters, as whether a LOB can establish an "undue burden", whether it has provided "equivalent access", whether an employee is "a qualified individual with a disability", and whether a manager must provide a "reasonable accommodation".

## **ROLE AND RESPONSIBILITIES OF POLICY AND PLANNING TEAM**

The costs to ensure Section 508 compliance should be a part of the strategic and planning process. The below team or LOB/SO has the responsibility to ensure that Section 508 is a part of the budget process.

**Role:** The Policy and Planning Team or LOB/SO should ensure that 508 is included in the LOB, region, and center's strategic plans and performance plans. Section 508 should be tied to



the budget process within each LOB, region, and center. Per the Office of Budget and Management exhibit 300 Section 508 should be apart of the budget and planning process.

**Note:** The FAA has not established a policy and planning team for Section 508. Some of these tasks may be performed within the program offices within the LOB/SO. Section 508 training will assist in determining whether a 508 planning and policy team is necessary. Most of the below listed responsibilities will be facilitated by the designated Section 508 coordinators in Headquarters, regions, and centers.

### **Responsibilities:**

- Ensuring accessibility is included in 2004 budget.
- Leveraging Section 508 budget needs with E-FOIA, E-GOV, GPEA, and Security
- Working with CIO and CFO to meet Section 508 compliance.
- Briefing Senior Managers and inform them of the need to include Section 508 requirements in their operating plans.
- Estimate the costs of purchasing Section 508 compliant EIT within the LOB and add these costs to the IT Capital Planning process.
- Respond to future Department of Justice Section 508 surveys.
- Integrate Section 508 accessibility needs into agency budget plans, strategic plans, and EIT capital plans.
- Ensure contracting representatives within the LOB/SO support validation of accessible EIT systems performance prior to deployment.
- Provide sources of education and training to key personnel within the department/agency on: how Section 508 will affect their organizations, what services and support are available, and procurement changes that will affect the purchase of any new equipment or software.
- Ensure that groups responsible for: implementing the Government Paperwork Elimination Act (GPEA), the Government Performance and Results Act (GPRA), the Agency's Enterprise Architecture, Security Policies, Change Control Boards, Tools Selection Committees, Standards Workgroups, Electronic Service Delivery Committees, etc. include 508 in their work plans and policies. May consider giving presentations and/or educating these groups on Section 508 to make sure that they are complying with the Section 508 standards when developing, procuring, or maintaining EIT.
- Provide recommendations and expertise to the FAA Section 508 Coordinator regarding Section 508 implementation issues and solutions.
- Support the development of policies and procedures to ensure Section 508 compliance.
- Assist in the education and training of agency personnel regarding Section 508 compliance requirements, policies, and procedures.

## **SECTION 508 TRAINING TEAM**

The 508 Training Team formed in March of 2002 to review modules for 508 training to be offered in the FAA. The Section 508 Training Team members are as follows:

AIO Deborah Douglas-Slade  
AGC Robert Zuckerman, Legal for Procurement  
AGC Julia Rhodes, 508/504 for Legal Matters  
ARA Shirley CTR McGowan, AUA 508 Training Reviewer  
ARA Ralph Randall, 508 Procurement Policy  
AND Katherine Williams, AND 508 Training Reviewer  
ATS Cissy Lemon, AIR-510A  
ATN Rich Schrum, ATN Operations, Manager  
ATS Angelique Berry, Training Program Analyst  
ATS Mary Sand, Instructional System Design Specialist  
Cessi Shelia Newman  
Cessi Jane Rath  
Cessi Janice Thomas  
Cessi Paul Shafer  
Cessi Steve Berger  
Cessi Anne Wisecarver

The 508 Training Team reviewed, analyzed, and tailored five Section 508 modules that were developed by Cessi. Each module was developed to reflect FAA's current implementation of 508 within the agency. Each module was reviewed to determine the following:

- Is the material clear and easy to understand?
- Will the material help the targeted audience understand and apply 508?
- Is the material presented at the correct knowledge level of the target audience?
- Does the material reflect the FAA environment?
- Other issues or considerations.

All class participants are requested to fill out the evaluation form and provide feedback on the training modules and the presenters of the Section 508 training classes.

Phase One of the 508 Training process includes the following modules:

- (1) History and Application of Section 508
- (2) FAA's Procurement and Acquisition Guidance
- (3) Software Applications and Operating Systems
- (4) Web-Based Intranet and Internet Information and Applications
- (5) Video and Multimedia Products

Phase Two will include the following 508 modules:

- Telecommunications Products
- Self-Contained, Closed Products

- Desktop and Portable Computers

Training in these modules should heighten the awareness of the Section 508 standards and requirements. Training in these areas will assist in determining whether agency-wide teams should form to address the additional 508 standards.

### **ROLES AND RESPONSIBILITIES OF THE ASSESSMENT TEAM**

**Role:** To conduct an assessment of the LOB/SO within the FAA to determine whether the LOB/SO is in compliance with the Section 508 requirements.

**Responsibilities:**

- Develop a survey or questionnaire for the program managers of each LOB/SO to provide answers
- Inform the LOB/SO representatives answering the survey or questionnaire that appropriate documentation must be maintained
- Analyze the results of the survey or questionnaire and submit a report with recommendations to the Section 508 Coordinators.
- Ensure that the report findings and recommendations provide information that supports an update to the compliance plan.
- Update the Section 508 compliance plan.

### **ROLES AND RESPONSIBILITIES OF THE SECTION 508 WORKING GROUP**

This group is made up of the Section 508 coordinators from the LOBs, SOs, regions, and centers. It includes the FAA Section 508 coordinator.

**Roles:**

- Serves as a clearinghouse for Section 508 issues, resolving those where appropriate and referring those that cannot be resolved to higher management.
- Establishes POCs and other contacts necessary to facilitate and institutionalize Section 508 compliance within the agency.
- Advocates Section 508 Program resources.
- Promotes technical teams (i.e. , web developers and software developers) to convene and resolve Section 508 technical issues.
- Oversees the components and processes of FAA's Section 508 Program.
- Plans and controls the execution of the FAA Section 508 compliance plan.

**508 FAA SECTION 508 SELF-ASSESSMENT TEAM QUESTIONS**

Other federal agencies have developed assessment tools, which may be available to the FAA in the future. Until such assessment tools are available, each LOB/SO, region and center should conduct a self-assessment. An assessment at a minimum would answer the following questions:

**Procurement and Acquisition**

- Are FAA personnel aware of the 508 Standard Operating Procedures for Section 508?
- Do all of my electronic and information technology contracts include appropriate language for Section 508?
- Do my procurement personnel know to ask Legal if in doubt about the requirements of Section 508?

**Section 1192.21-Software Applications and Operating Systems**

- Do the key personnel within the agency have a clear understanding of the Section 508 requirements for software applications and operating systems?
- Is the software operating system (i.e. legacy system) accessible with or without assistive technology?
- Do I have a plan to maintain accessibility of software for the long term?
- Do I need to determine whether software needs to be upgraded and evaluated for accessibility?
- Should I develop a plan for prioritizing evaluation and upgrade of software?
- Are the agency's software policies and procedures in compliance with Section 508?

**Section 1194.22-Web-based Information and Applications**

- Have the agency's webmasters and web developer's completed FAA's 5 Steps to 508 Web Accessibility for Webmasters and Web Developers?
- Do I have a plan to ensure the agency's web sites comply with Section 508?
- Are my web sites reviewed for 508 compliance prior to posting?
- If a customer has a Section 508 issue with my web site, do I have a contact person identified on each web page?
- Do I have an action plan that shows how I will comply with Section 1194.22-Web-based Information and Applications?

**Section 1194.23-Telecommunication Products**

- Do the agency's telecommunication policies and procedures need to be changed to reflect compliance with Section 508?
- Do policies and procedures need to be developed within the agency to reflect compliance with Section 508?
- Does the agency need to develop a telecommunications plan for the long-term?
- Do I have an estimate of the costs that it will take to ensure Section 508 compliance for telecommunication products? If so, has this been included in budget and strategic planning documents?

**Section 1194.24-Video and Multimedia Products**

- Are agency personnel aware of the Section 508 requirements for Video and Multimedia?
- Do I have an estimate of the costs that it will take to ensure Section 508 compliance for Video and Multimedia products? If so, has this estimate been included in budget and strategic planning documents?
- Do policies and procedures need to be developed within the agency to reflect compliance with Section 508?
- Does the agency need to develop a video and multimedia plan for the long-term?

**Section 1194.25-Self-Contained, Closed Products (e.g., information kiosks, calculators, copiers, and fax machines)**

- Are agency personnel aware of the Section 508 requirements for Self-Contained, Closed Products?
- Do I have an estimate of the costs that it will take to ensure Section 508 compliance for Self-Contained, Closed Products?
- Do policies and procedures need to be developed within the agency to reflect compliance with Section 508?
- Do I have an estimate of the costs that it will take to ensure Section 508 compliance for Self-Contained, Closed Products? If so, has this estimate been included in budget and strategic planning documents?

**Section 1194.26-Desktop and Portable Computers**

- Are agency personnel aware of the Section 508 requirements for Desktop and Portable Computers?
- Do I have an estimate of costs that it will take to ensure Section 508 compliance for Desktop and Portable computers? If so, has this estimate been included in the budget and strategic planning documents?
- Do policies and procedures need to be developed to reflect compliance with Section compliance?

## **ROLE AND RESPONSIBILITIES OF WEBMASTERS/DEVELOPER**

The FAA CIO determined that the agency would pursue compliance of the Top 20 Intranet and Internet web sites within the agency. Therefore, the initial strategy is to ensure compliance of the Top 20 Intranet and Internet web sites. The Section 508 Review Team periodically reviews the web sites and issues review results reports to the Section 508 Points of Contact and the Chief Information Officer, who is member of the Web Policy Council, within each LOB.

In an effort to comply with Section 1194.22, Web-based Intranet and Internet information and applications, the FAA has developed Section 508 Accessibility Guidelines. The Section 508 Accessibility Guidelines and Checklist are available on the following **web site**: <http://intranet.faa.gov/aio/508/index.cfm?section=10111> and <http://intranet.faa.gov/aio/508/index.cfm?section=10112> These guidelines provide detailed guidance on how to comply with the Access Board standards. The major areas addressed are: Portable Document Format (PDF), scripts, applets and plug-ins, non-text elements, image maps, multimedia, color, navigation and design and style sheets. A Web Accessibility Self-Evaluation Form has been developed that allows a webmaster or web developer the means to conduct a self-evaluation of a web page. FAA has identified the Top 20 Internet and Intranet web pages and web sites, which are listed at: <http://intranet.faa.gov/aio/508/index.cfm?section=1088>

Each Line of Business (LOB) and staff office (SO) had the responsibility to ensure Section 508 compliance of the Top 20 by the December 31, 2001 deadline. Also, many of the other LOBs and Staff Offices that are not in the Top 20 are beginning to make their pages compliant with Section 508. The FAA Section 508 web site listed the Top 20 web sites and indicates whether each is in compliance with the requirements. The information on the web site in the tables reflects the results on the day of the review. On-going efforts by the LOB and SO may not be reflected in the tables.

The following LOBs have websites that are included in the Top 20: AHR, AIO, APA, ARA, ARC, ARP, ATS, and AVR. It is the goal of the agency to ensure that these sites are compliant within timeframes specified below. The Section 508 implementation strategy is for each LOB to develop an action plan to ensure compliance of its Top 20 Internet and Intranet web sites. The stages of compliance are:

- **Stage 1:** Every home page and one level (link) down will be Section 508 compliant. Completion date: December 31, 2001
- **Stage 2:** Second level links within the web sites control must be compliant. Completion date: March 31, 2002
- **Stage 3:** Successive level links within the web sites control must be compliant. Completion date: June 21, 2002

LOB's with Web sites that are not listed in the Top 20 are also required to develop an action plan that shows their strategy for Section 508 compliance. These web sites are listed at: [http://intranet.faa.gov/aio/508/q\\_idx.cfm?section=44](http://intranet.faa.gov/aio/508/q_idx.cfm?section=44)

The FAA Section 508 Coordinator strongly recommends that each LOB that manages one of the top 20 web sites as well as the remaining LOBs and SOs prepare an action plan similar to the plan created by the ARP. See this plan at:

<http://intranet.faa.gov/aio/508/index.cfm?section=105502>

It is the goal of the FAA Section 508 Coordinator to advise that each LOB in the Top 20 and the remaining LOBs and SOs prepare a similar action plan.

All LOBs and SOs, when complying with Section 508, for web sites should at a minimum ensure that:

- All contractors and federal employees that make web page and/or web site changes to a federal web site ensure that each web page and web site comply with the requirements of the Access Board standards.
- Each web page displays an accessibility link.

The FAA Section 508 Help Desk responds to technical inquiries from personnel in Headquarters and the Regions from 8:00 a.m. to 5:00 p.m. The FAA Section 508 Help Desk can be contacted at (202) 267-8091 or directly from the web site.

The Section 508 Coordinator has requested that the Web Policy Council require that each LOB and SO ensure: (1) all web pages and web sites comply with the Access Boards Section 508 requirements, and (2) action plans are developed to show a strategy for compliance. Section 508 requirements are included in the Web Policy Council notice.

**Role:** Each web master and web developer should ensure that (1) AIO's Top 20 Internet and Intranet web pages and web sites are 508 compliant, (2) Develop action plans to ensure remaining web sites are compliant, and (3) Register web sites and comply with 508 provisions when updating web pages.

### **Responsibilities:**

- Complete the FAA 5 Steps to 508 Web Accessibility for Webmasters and Web Developers
- Review and comment on the updates/revisions to Section 508 standards.
- Update and provide feedback to 508 Review Results Reports issued by the FAA 508 Coordinator.
- Provide information and data requested by the FAA Section 508 Team relative to web site remediation.
- Attend training sessions on web site accessibility and, in turn, train others.
- Obtain training on the FAA's automated tool and apply to web site remediation process.
- Utilize web site inventory automated tools to provide a roadmap for required remediation efforts and training requirements.
- Identify current needs for accessible systems and adaptive technology (hardware/software) and identify EIT deficiencies that impact the performance of persons with disabilities in both current and prospective EIT web sites and operating systems.
- Work with software vendors/developers on accessibility issues relating to EIT web sites and operating systems.
- Support validation of accessible EIT web site performance (use of screenreader) prior to

- deployment.
- Participate in monitoring, measurement, and disclosure activities including usability and accessibility testing of web sites.

## **ROLE AND RESPONSIBILITY OF PEOPLE WITH DISABILITIES TEAM**

Section 508 will impact people with disabilities. The Section 508 Coordinator has a working relationship with the National People with Disabilities Program Manager, Stephanie Ortolevac. Their plan is to work together to determine what is necessary to ensure the needs of people with disabilities are met when implementing and applying the Section 508 standards and requirements.

The People With Disabilities Team is required to conduct roles and responsibilities that facilitate the 508 compliance of procurement activities within the agency. The below listed responsibilities are subject to change as the Access Board and the General Services Administration issue additional and updated Section 508 policies and procedures. All changes to the People with Disabilities Team's roles and responsibilities will be reflected on the [Section 508 web site](http://intranet.faa.gov/aio/508) located at <http://intranet.faa.gov/aio/508>

**Role:** The People with Disabilities Program Manager should ensure that Section 508 is included in the LOB/SO, region, and center's daily processes.

### **Responsibilities:**

- Develop and include Section 508 awareness into existing training programs.
- Provide expertise on accessibility gained through Section 504 accommodations to ensure web sites are accessible, to identify assistive technology solutions and to identify EIT deficiencies impacting the performance of people with disabilities.
- Establish and implement a complaint process to handle Section 508 issues. It is anticipated that this will follow Section 504 processes already in place.
- Participate on the Section 508 Working Group.
- Develop and submit issues and problems that impede the success of 508 within the agency to the FAA Section 508 Coordinator.

## **ADDITIONAL TEAMS WITHIN THE FAA**

Section 508 is continually evolving. Additional teams may be necessary to fulfill the needs of the standards and requirements. As each LOB is trained to understand the Section 508 standards and requirements, each may pursue and develop a plan to fulfill the Section 508 requirements. The overall agency-wide approach has not been determined. In addition, one team that maybe necessary in the future would be a technical team that has at a minimum the below listed responsibilities:

- Identify current needs for accessible systems and adaptive technology (hardware/software) and identify EIT deficiencies that impact the performance of persons with disabilities in the current and perspective EIT systems.



- Work with software vendors/developers on accessibility issues relating to EIT systems
- Participate in monitoring, measurement, and disclosure activities including usability testing and property setting.
- Support validation of accessible EIT systems performance prior to deployment.

There are additional areas that need to be addressed to ensure 508 compliance. One area of major concern within the FAA is self-assessment of each LOB/SO's Section 508 needs. An example of the questions that identifies the components is in the Participant's Guide. The questions are provided to use as a means to understand the additional areas under Section 508 that should be taken into consideration for compliance. To be specific, the Access Board Standards identified for Section 1194.21 Software Applications and Operating Systems, Section 1194.22 Web-Based Internet & Intranet Information and Applications, Section 1194.24 Video and Multimedia Products, Section 1194.23 Telecommunications Products, Section 1194.25 Self-Contained, Closed Products, 1194.25 Desktop and Portable Computers, Section 1194.32, Functional Performance Criteria, and Section 1194.41, Information, Documentation, and Support are the remaining areas to be explored within the FAA.

In the meantime, the FAA personnel in each LOB/SOs should review the questions in the Participants Guide to determine what would be necessary to ensure compliance with the standards.

## **Part 3: LOB Section 508 Plan of Action**

This section of the training outlines the proposed LOB Section 508 Plan of Action. This Plan of Action was created by the FAA Section 508 Coordinator to assist LOB/SO's in implementing the Section 508 standards. Included in this section of the training relating to the LOB/SO Plan of Action are:

- [Refer to FAA Section 508 Compliance Plan](#)
- [Office of Management and Budget DRAFT Exhibit 300](#)
- [DOT DIRMM Electronic and Information Technology Accessibility Chapter 2](#)

## **Part 4: Section 508 Resources**

### **Section 508 Resources:**

[Section 508 History](http://www.section508.gov/index.cfm?FuseAction=Content&ID=3): <http://www.section508.gov/index.cfm?FuseAction=Content&ID=3>

[Access Board](http://www.access-board.gov/sec508/guide/act.htm): <http://www.access-board.gov/sec508/guide/act.htm>

[Section 508 Resource](http://www.section508.gov/index.cfm?FuseAction=Content&ID=4): <http://www.section508.gov/index.cfm?FuseAction=Content&ID=4>

[Information Technology Technical Assistance & Training Center \(ITTATC\)](http://www.ittatc.org):

<http://www.ittatc.org>

[Section 508 Acquisition FAQ's](http://www.section508.gov/index.cfm?FuseAction=Content&ID=75):

<http://www.section508.gov/index.cfm?FuseAction=Content&ID=75>